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# Enforcement Annual Results for Fiscal Year (FY) 2014

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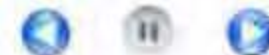
EPA enforcement of the nation's environmental laws is focused on large cases that drive compliance across industries and that have a high impact on protecting public health and the environment.

Our enforcement accomplishments include:

- **\$9.7 billion** in investments by companies in actions and equipment to control pollution and clean up contaminated sites
- **\$163 million** in combined federal administrative, civil judicial penalties and criminal fines
- **\$16 million** in court-ordered environmental projects resulting from criminal prosecutions
- **155 combined years** of incarceration for sentenced defendants
- **\$453.7 million** in commitments from responsible parties to clean up Superfund sites
- The company [Lowe's Home Centers](#) agreed to a corporate-wide compliance program that ensures contractors across the country follow laws to protect children from dangerous lead paint exposure.
- The nation's second largest natural gas producer, [Chesapeake Appalachia](#), agreed to restore streams and wetlands damaged from its operations. The company will implement a comprehensive plan to comply with water protection laws.
- [Titanium Metals Corporation](#), one of the world's largest producers of titanium parts for jet engines, agreed to pay a record \$14 million civil penalty and prevent the improper disposal of 56 million pounds of hazardous waste and 84,000 pounds of PCB contaminated waste each year.
- [Tonawanda Coke](#) was found guilty for illegally releasing benzene from its facility into neighboring communities. Tonawanda is required to pay a \$12.5 million criminal penalty and to fund \$12.2 million in community service in New York.
- Settlements with companies like [Minnesota Power](#) and [Wisconsin Electric Power Company](#) are cutting emissions from coal fired power plants. Companies must now control pollution and conduct innovative mitigation projects that promote renewable energy development and protect clean air for local communities.
- We are reducing dangerous air toxics released from industrial flares at refineries and chemical plants. Companies like [Shell](#) and [DuPont](#) are required to implement cutting edge monitoring and pollution control technologies. These efforts are equipping minority and low-income communities with monitoring data, while reducing toxic air pollution for residents living near the facilities.
- We are working closely with cities to cut discharges of raw sewage and contaminated stormwater to the nation's waters through green infrastructure, integrated planning, and innovative approaches. Recent cases such as [East Bay MUD](#) (California), [Metropolitan Water Reclamation District](#) (Illinois) and [Miami-Dade County](#) (Florida) reflect this progress.
- We are ensuring federal facilities take responsibility and clean up the toxic pollution they create. Examples include actions at the [Camp Minden, Louisiana](#) U.S. Army site and the Hanford, Washington Superfund site.



Tonawanda Coke was found guilty and required to pay a penalty and fund community service.



Progress on our National Enforcement Initiatives:

- [Reducing Air Pollution from the Largest Sources](#)
- [Cutting Hazardous Air Pollutants](#)
- [Ensuring Energy Extraction Activities Comply with Environmental Laws](#)
- [Reducing Pollution from Mineral Processing Operations](#)
- [Keeping Raw Sewage and Contaminated Stormwater Out of Our Nation's Waters](#)
- [Preventing Animal Waste from Contaminating Surface and Ground Water](#)

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# Enforcement Annual Results Concluded Cases Map for Fiscal Year (FY) 2014

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## Concluded EPA Enforcement Cases Map

This interactive map shows information on concluded enforcement actions and cases from fiscal year (FY) 2014. They include:

- civil enforcement actions taken by EPA at facilities,
- criminal cases prosecuted by EPA under federal statutes and the U.S. Criminal Code, and
- cases in which EPA provided significant support to cases prosecuted under state criminal laws

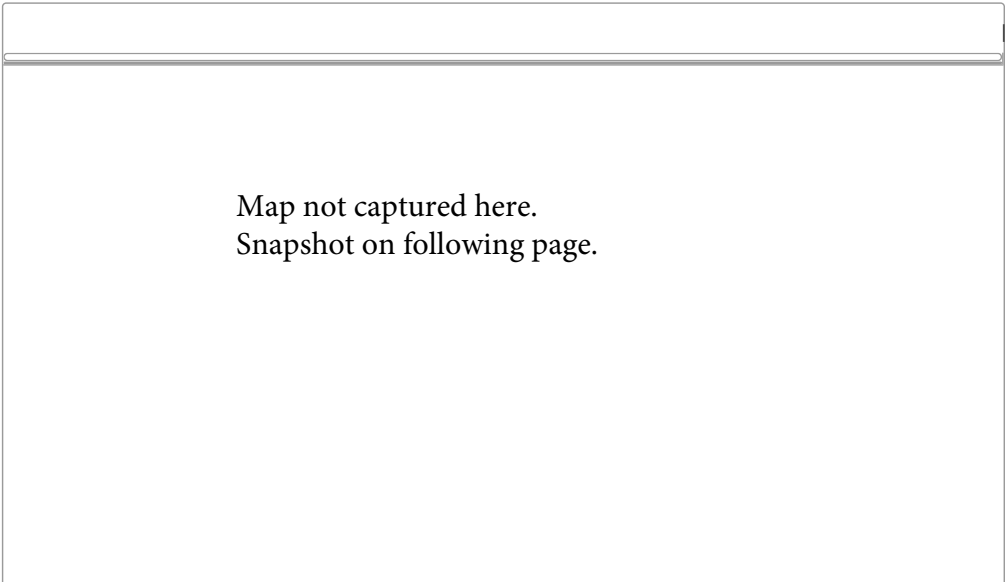
The indicators on the map generally mark the location of the site or facility where the violations occurred or were discovered.

### How to Use the Map

The map displays all FY 2014 EPA enforcement actions. Add or subtract one or more layers (e.g. Air Water, Criminal) from the map by clicking on the "Layers" menu in the gray box beside the map. Check or un-check the box next to the program layer of interest.

Zoom the map to an exact location. Enter a city and state in the search box, then press the [Enter] key on your keyboard or use the zoom bar in the map's upper left corner. Click on the indicator to get information on the environmental enforcement case. See "[Questions About the Maps](#)" for additional [information and needs accommodations related to a disability](#).

Find address or place: Enter city and state. Press [Enter] on your keyboard.





Civil enforcement actions at facilities and criminal enforcement actions concluded in FY 2014.

Civil enforcement cases not represented on this map.

State	City	Facility Site Name	Law	FacilityID
State	City	Name	Primary Law	FRS/Program ID
WI	Warrens	A&K Alexander Cranberry Co., LLC	CWA	110044237028
NY	New York	Biddle Sawyer (Import)	FIFRA	ICIS 3400101027
NY	New York	Biddle Sawyer Corp (Import)	FIFRA	ICIS 3400101027
WI	Cedarburg	Cedar Creek (Ou 2a) - Admin Settlement Agrmt (CERCLA)	CERCLA	110009317890
MN	Eden Prairie	Cef Of Minnesota	TSCA	ICIS 3400104262
MI	Belleville	Eq The Environmental Quality Co Site 2 A/K/A Eq-Belleville	CAA	110011909863
OH	Evendale	General Electric	TSCA	ICIS 3400105265
MI	New Buffalo	Harbor Country Travel Plaza	RCRA	110059719826
MI	Bothwell, Ont.	Harold Marcus Limited	RCRA	110041676380
WV	Bemis	Harris, Timothy (White's Campground)	SDWA	110055261728
MI	Walled Lake	Heritage Apartments (AO)	SDWA	ICIS 3400101023
OH	Elida	Holman Brothers Painting	TSCA	ICIS 3400100429
IN	Franklin	Johnson County Surveyor And Johnson County Drainage Board	CWA	110045455468
WI	Green Lake	Kinas Excavating, Inc.	CWA	110056132867
IL	Ullin	Kraatz	CWA	110041196586
IL	Ullin	Kraatz	CWA	110041196586
OH	Trotwood	Lowe's Inc.	TSCA	110020121722
IL	Alton	Mrc Holdings	TSCA	ICIS 3400099772
IL	Brussels	Odeleh's Roadside Market	FIFRA	ICIS 3400104665
OH	Louisville	Ohio Trading Inc	CWA	110044245992
IL	Fairmont City	Old American Zinc - Admin Order On Consent & Stlmnt Agrmt (CERCLA)	CERCLA	110009280072
NV	Mountain City	Rio Tinto Administrative Order Directing Compliance With Request For Access	CERCLA	110009324105
IN	Cory	River Bottom Improvement Co., Inc.	CWA	110041208555
AK	Not Applicable	The Fishing Company Of Alaska Inc., F/V Alaska Warrior - Consent Agreement And Final Order	CWA	110042365918
WI	Appleton	Thomas Putzer	FIFRA	ICIS 3400100875
WI	Green Lake	Timothy And Kathleen Flannery	CWA	110056395299
MI	Lemon	Two Guys And A Grow Shop, LLC	FIFRA	ICIS 3400102380

IL	Chicago	Us Scrap - Consent Decree (CERCLA)	CERCLA	110010737658
PR	Caguas	Victor Roberto Fernandez Ramos Et Al. - Fincas Mi Recreo	SDWA	110013046293
WI	Two Rivers	Wpsc Two Rivers Mgp - Admin Stlmt Agrmnt & Order On Consent (CERCLA)	CERCLA	110022431509

- Cleanup cases are civil enforcement actions taken under the Superfund program and the RCRA corrective action and leaking underground storage tank programs.
- Criminal enforcement cases include those prosecuted by EPA under federal statutes, the U.S. Criminal Code (Title 18), and cases in which EPA provided significant support to cases prosecuted under state criminal laws.
- Federal - Includes federal agencies and contractors at federal facilities.

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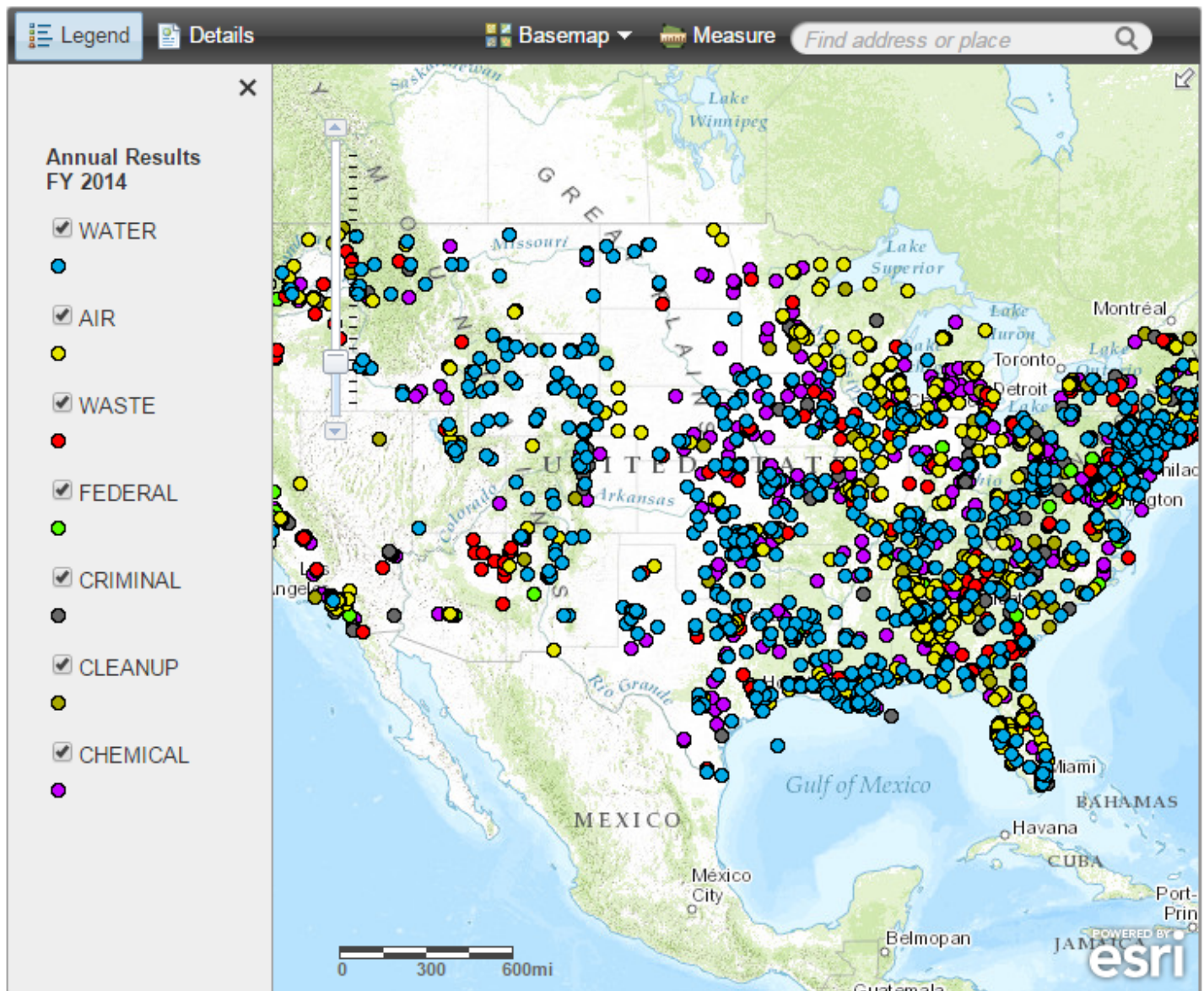
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# Map image capture:

## Enforcement Annual Results Concluded Cases Map for Fiscal Year (FY) 2014





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# Enforcement Annual Results Numbers at a Glance for Fiscal Year (FY) 2014

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## Accomplishments

The following is a list of key results of compliance and enforcement activities.

Civil Enforcement Results	
	Concluded Cases
Pollution Reduced, Treated or Eliminated (Pounds) <sup>2</sup>	515,000,000
Hazardous Waste Treated, Minimized, or Properly Disposed of (Pounds) <sup>2</sup>	711,000,000
Contaminated Soil to be Cleaned Up (Cubic Yds) <sup>2</sup>	15,000,000
Contaminated Water to be Cleaned Up (Cubic Yds) <sup>2</sup>	856,000,000
Stream Miles Restored or Created (Linear Feet)	79,457
Wetlands Restored or Created (Acres)	573
People Protected by Safe Drinking Water Act Enforcement (# of People) <sup>3</sup>	839,000
Toxic Material Abated (# Housing Units, Schools, Buildings)	255
Volume (gallons) of Untreated Discharge Eliminated <sup>1</sup>	73,900,000,000
Hazardous Waste Prevented from Release (Pounds) <sup>2</sup>	30,000,000
Liquid in Underground Storage Tanks Prevented from Release (Gallons) <sup>2</sup>	3,000,000
Underground Injection Wells Prevented from Leaking (# of Wells)	5,007
Toxic Substance Contamination Prevented (# of Housing Units, Schools, Buildings)	8
Volume of Oil Spills Prevented (in Gallons) <sup>1</sup>	200,000,000
Toxic Chemicals and Pesticides Prevented from Misuse/Environmental Release (Pounds) <sup>2</sup>	30,000,000
Stream Miles Preserved (Linear Feet)	4,111
Wetlands Preserved (Acres)	59

Civil Enforcement Monetary Commitments	
	Concluded Cases
Estimated Value of Complying Actions to be Taken in Response to EPA's Concluded Enforcement Actions (Injunctive Relief) <sup>2</sup>	\$9,738,000,000
Estimated Investments in Projects that Benefit the Environment and Public Health (Supplemental Environmental Projects) <sup>2</sup>	\$17,000,000
Administrative Penalties Assessed <sup>2</sup>	\$44,000,000
Judicial Penalties Assessed <sup>2</sup>	\$56,000,000
State/Local Judicial Penalties Assessed From Joint Federal-State/Local Enforcement Actions <sup>2</sup>	\$7,000,000
Stipulated Penalties Paid <sup>2</sup>	\$11,000,000

Superfund Cleanup Enforcement	
Amount Committed by Liable Parties to Clean up Superfund Sites <sup>2</sup>	\$454,000,000
Amount Committed by Liable Parties to Pay for Government Oversight of Superfund Cleanups <sup>2</sup>	\$89,000,000

Amount Committed by Liable Parties to Reimburse the Government for Money Spent Cleaning up Superfund Sites <sup>2</sup>	\$58,000,000
** See <a href="#">Cleanup Enforcement Program Accomplishments</a>	

Civil Enforcement and Compliance Activities

Referrals of Civil Judicial Enforcement Cases to Department of Justice (DOJ)	118
Supplemental Referrals of Civil Judicial Enforcement Cases to DOJ	22
Civil Judicial Complaints Filed with Court	93
Civil Judicial Enforcement Case Conclusions	122
Administrative Penalty Order Complaints	1,336
Final Administrative Penalty Orders	1,340
Administrative Compliance Orders	824
Cases with Supplemental Environmental Projects	100
Inspections/Evaluations <sup>4</sup>	15,600
Civil Investigations	487

Criminal Enforcement Program

Environmental Crime Cases Opened	271
Defendants Charged	187
Years of Incarceration	155
Fines and Restitution <sup>2</sup>	\$63,000,000
Value of Court Ordered Environmental Projects <sup>2</sup>	\$16,000,000
** See <a href="#">Criminal Enforcement Major Case Highlights</a>	

National Environmental Policy Act  
(NEPA) Program

\*\* See [NEPA Program Annual Results](#)

Where necessary to reflect EPA's understanding of the precision of the data, numbers in this document and elsewhere on this Web site have been rounded to two or three significant digits.

The primary source for the data displayed in this document is the EPA Regions certified FY 2014 end of year workbooks as of November 14, 2014. The official databases of record are:

- Integrated Compliance Information System (ICIS)
- Criminal Case Reporting System
- Comprehensive Environmental Response, Compensation & Liability Information System (CERCLIS)
- Resource Conservation and Recovery Act Information (RCRAInfo)
- Air Facility System (AFS)

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## Accomplishments by EPA Region

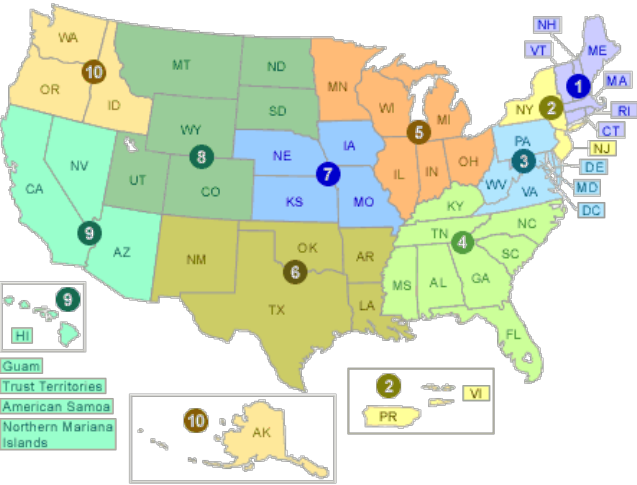
EPA's regional offices work with state and tribal governments to ensure compliance with our nation's environmental laws. Our civil and criminal enforcement actions are focused on the most serious water, air and chemical hazards including those identified in EPA's national enforcement initiatives and advance environmental justice by protecting overburdened communities.

To see results of EPA's enforcement work in our regional areas, select your state from the list or map below to go to your state's EPA regional enforcement results.

### Select a Link

After you select a link, press go to jump to that link.

Alabama - Region 4



### EPA Region 1

Serving Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont

### Accomplishments:

Civil Cases	
Estimated pollution reduced, treated or eliminated (pounds) <sup>1</sup>	2,102,000
Estimated contaminated water/aquifer to be cleaned up (cubic yards)	31,022,000
Estimated contaminated soil/debris to be cleaned up (cubic yards)	1,595,000

Enforcement Activities		
	Case initiations	101
	Case conclusions	107

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## EPA Region 2

Serving New Jersey, New York, Puerto Rico, and the U.S. Virgin Islands.

### Accomplishments:

Civil Cases		
	Estimated pollution reduced, treated or eliminated (pounds) <sup>1</sup> .	63,210,000
	Estimated hazardous waste treated, minimized, or properly disposed of (pounds) <sup>1</sup> .	564,081,000
	Estimated contaminated water/aquifer to be cleaned up (cubic yards)	19,361,000
	Estimated contaminated soil/debris to be cleaned up (cubic yards)	5,220,983
Enforcement Activities		
	Case initiations	287
	Case conclusions	299

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## EPA Region 3

Serving Delaware, the District of Columbia, Maryland, Pennsylvania, Virginia, and West Virginia.

### Accomplishments:

Civil Cases		
	Estimated pollution reduced, treated or eliminated (pounds) <sup>1</sup> .	313,000
	Estimated hazardous waste treated, minimized, or properly disposed of (pounds) <sup>1</sup> .	287,000
	Estimated contaminated water/aquifer to be cleaned up (cubic yards)	73,000
	Estimated contaminated soil/debris to be cleaned up (cubic yards)	74,000
Enforcement Activities		
	Case initiations	249
	Case conclusions	247

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## EPA Region 4

Serving Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee

### Accomplishments:

Civil Cases		
	Estimated pollution reduced, treated or eliminated (pounds) <sup>1</sup> .	19,527,000
	Estimated hazardous waste treated, minimized, or properly disposed of (pounds) <sup>1</sup> .	1,932,000
	Estimated contaminated water/aquifer to be cleaned up (cubic yards)	798,988,000
	Estimated contaminated soil/debris to be cleaned up (cubic yards)	1,168,000
Enforcement Activities		
	Case initiations	360
	Case conclusions	367

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## EPA Region 5

Serving Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin.

Accomplishments:

Civil Cases		
	Estimated pollution reduced, treated or eliminated (pounds) <sup>.1</sup>	333,744,000
	Estimated contaminated water/aquifer to be cleaned up (cubic yards)	9,000
	Estimated contaminated soil/debris to be cleaned up (cubic yards)	3,167,000
Enforcement Activities		
	Case initiations	321
	Case conclusions	319

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## EPA Region 6

Serving Arkansas, Louisiana, New Mexico, Oklahoma, and Texas

Accomplishments:

Civil Cases		
	Estimated pollution reduced, treated or eliminated (pounds) <sup>.1</sup>	66,107,000
	Estimated contaminated water/aquifer to be cleaned up (cubic yards)	383,000
	Estimated contaminated soil/debris to be cleaned up (cubic yards)	120
Enforcement Activities		
	Case initiations	306
	Case conclusions	309

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## EPA Region 7

Serving Iowa, Kansas, Missouri, and Nebraska.

Accomplishments:

Civil Cases		
	Estimated pollution reduced, treated or eliminated (pounds) <sup>.1</sup>	7,643,000
	Estimated hazardous waste treated, minimized, or properly disposed of (pounds) <sup>.1</sup>	88,000
	Estimated contaminated soil/debris to be cleaned up (cubic yards)	889,000
Enforcement Activities		
	Case initiations	182
	Case conclusions	173

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## EPA Region 8

Serving Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming.

Accomplishments:

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Civil Cases		
	Estimated pollution reduced, treated or eliminated (pounds) <sup>1</sup>	2,801,000
	Estimated hazardous waste treated, minimized, or properly disposed of (pounds)	2,400,000
	Estimated contaminated water/aquifer to be cleaned up (cubic yards)	854,000
	Estimated contaminated soil/debris to be cleaned up (cubic yards)	2,000
Enforcement Activities		
	Case initiations	138
	Case conclusions	140

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### EPA Region 9

Serving Arizona, California, Hawaii, Nevada, American Samoa, Commonwealth of the Northern Mariana Islands, Federated States of Micronesia, Guam, Marshall Islands, and Republic of Palau.

Accomplishments:

Civil Cases		
	Estimated pollution reduced, treated or Eliminated (pounds) <sup>1</sup>	9,883,000
	Estimated hazardous waste treated, minimized, or properly disposed of (pounds) <sup>1</sup>	137,041,000
	Estimated contaminated water/aquifer to be cleaned up (cubic yards)	5,034,000
	Estimated contaminated soil/debris to be cleaned up (cubic yards)	383,000
Enforcement Activities		
	Case initiations	90
	Case conclusions	97

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### EPA Region 10

Serving Alaska, Idaho, Oregon, and Washington.

Accomplishments:

Civil Cases		
	Estimated pollution reduced, treated or eliminated (pounds) <sup>1</sup>	5,960,700
	Estimated hazardous waste treated, minimized, or properly disposed of (pounds) <sup>1</sup>	5,000,000
	Estimated contaminated water/aquifer to be cleaned up (cubic yards)	152
	Estimated contaminated soil/debris to be cleaned up (cubic yards)	2,420,000
Enforcement Activities		
	Case initiations	174
	Case conclusions	163

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Sources for Data displayed in this document: Integrated Compliance Information System (ICIS), Comprehensive Environmental Response, Compensation & Liability Information System (CERCLIS).

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## Analysis and Trends

The links below show our progress in meeting performance targets and the trends in our enforcement results from fiscal year (FY) 2010 to 2014.

### Government Performance and Results Act (GPRA)

Measure Number	GPRA External Performance Measure	FY 14 Target	FY 14 Actual (rounded)
409	Number of federal inspections and evaluations	17,000	15,600
410	Number of civil judicial and administrative enforcement cases initiated	3,200	2,300
411	Number of civil judicial and administrative enforcement cases concluded	3,000	2,300
412	Percentage of open consent decrees reviewed for overall compliance status	100%	100%
418	Percentage of criminal cases having the most significant health, environmental, and deterrence impacts	43%	48%
420	Percentage of criminal cases with charges filed	40%	39%
419	Percentage of criminal cases with individual defendants	75%	87%
421	Percentage of conviction rate for criminal defendants	85%	95%
400 *	Millions of pounds of air pollutants reduced, treated, or eliminated through concluded enforcement actions	450 M lbs	141 M lbs
402 *	Millions of pounds of water pollutants reduced, treated, or eliminated through concluded enforcement actions	320 M lbs	337 M lbs
404 *	Millions of pounds of toxic and pesticide pollutants reduced, treated, or eliminated through concluded enforcement actions	3.0 M lbs	36 M lbs
405	Millions of pounds of hazardous waste pollutants reduced, treated, or eliminated through concluded enforcement actions	6,500 M lbs	711 M lbs
417	Millions of cubic yards of contaminated soil and groundwater media EPA has obtained commitments to clean up as a result of concluded CERCLA and RCRA corrective action enforcement actions.	225 M cu. yds	870 M cu. yds.
285	Percentage of Superfund sites having viable, liable responsible parties other than the federal government where EPA reaches a settlement or takes an enforcement action before starting a remedial action.	99%	100%
078	Percentage of all Superfund statute of limitations cases addressed at sites with unaddressed total past costs equal to or greater than \$500,000.	100%	100%

\* GPRA measures 400, 402, and 404 respectively quantify pollutant releases that are or will be reduced, treated or eliminated to air, water, and land as a result of EPA enforcement actions. Measure 404 includes reductions of pollutant releases to land (e.g., RCRA non-hazardous waste, oil, gasoline, or solvents), as well as reductions in distribution of illegal products, including pesticides and new and existing chemicals.

### Civil Enforcement Case Information

- [Estimated Value of Administrative and Civil Judicial Complying Actions \(Injunctive Relief\) \(PDF\)](#)
- [Administrative and Civil Judicial Penalties Assessed \(PDF\)](#)

Superfund Enforcement

- [Volume of Contaminated Water and Soil to be Cleaned Up \(PDF\)](#)
- [Superfund Results \(PDF\)](#)

Other Civil Measures

- [Commitments to Reduce, Treat or Eliminate Pollution \(PDF\)](#)
- [Hazardous Waste Treated, Minimized, or Properly Disposed Of \(PDF\)](#)
- [Civil Enforcement Case Initiations and Conclusions \(PDF\)](#)
- [Federal Inspections and Evaluations \(PDF\)](#)
- [Supplemental Environmental Projects \(PDF\)](#)

Criminal Enforcement Program

- [Environmental Crime Cases Opened, Defendants Charged and Sentencing Results – Years of Incarceration \(PDF\)](#)
- [Value of Fines and Restitution and Court Ordered Environmental Projects \(PDF\)](#)

Single Document Containing All Charts and Graphs

- [FY 2014 Enforcement Annual Results - Trend Data \(PDF\)](#) (13 pp, 184 K, 12/15/2014)

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# **Fiscal Year 2014 EPA Enforcement and Compliance Annual Results**

**Prepared by the Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency**

**December 18, 2014**

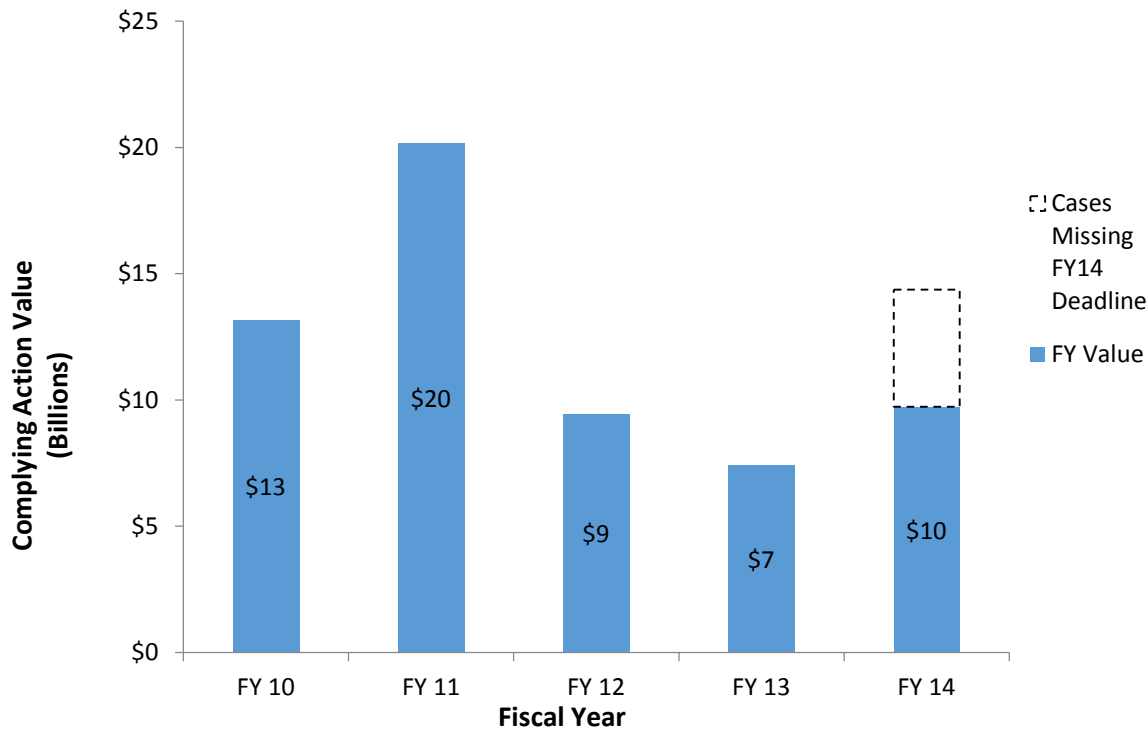
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# FY 2014 Enforcement and Compliance Annual Results

## Estimated Value of Administrative and Civil Judicial Complying Actions (Injunctive Relief) FY 2010 – FY 2014



Data Source: Integrated Compliance Information System (ICIS)  
Prepared by: OC/ETDD/DSIMB  
November 7, 2014

Note: All prior FY dollar figures in this report are adjusted to reflect the current value in FY 2014 dollars based on the monthly rate of inflation/deflation as determined by the U.S. Department of Labor Consumer Price Index for All Urban Consumers.

➤ In FY 2014, EPA enforcement actions required companies to invest more than **\$9.7 billion** in actions & equipment to control pollution (injunctive relief.)

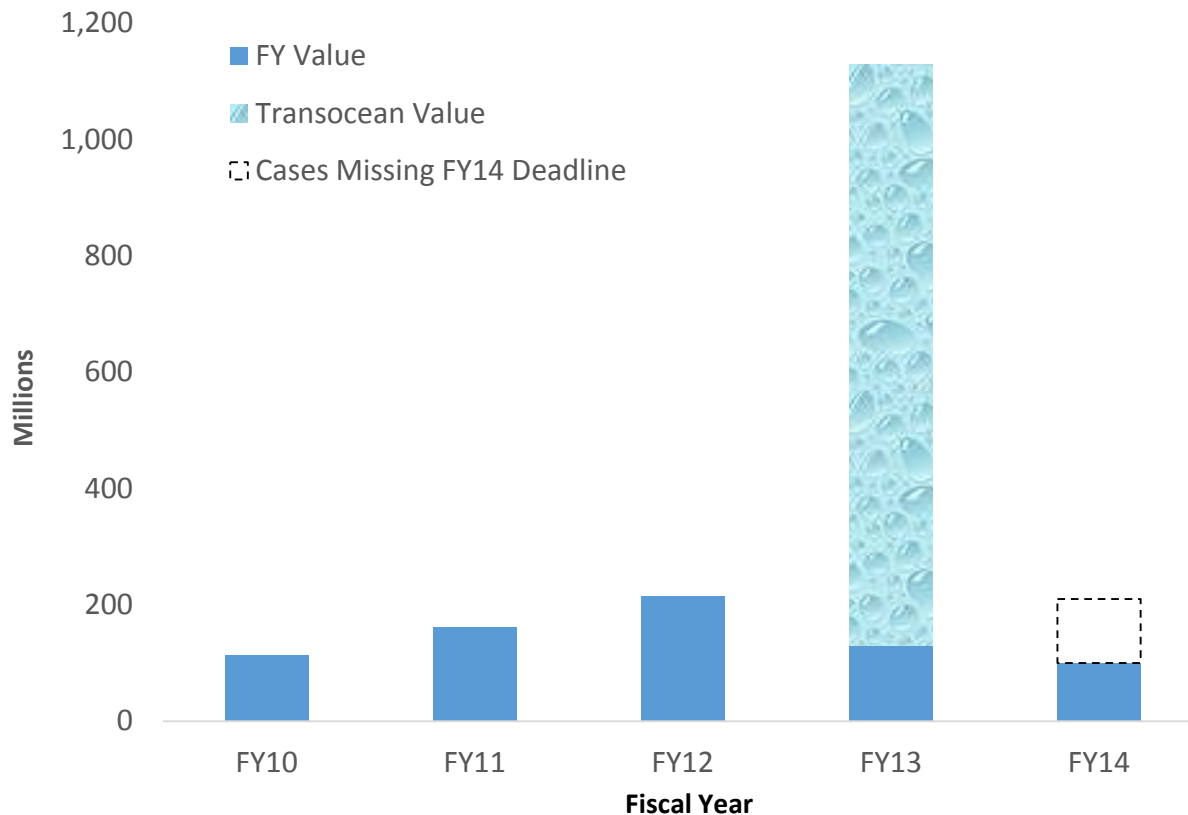
➤ A number of large cases at the beginning of FY15 (shown in dotted bar) would have, if resolved just weeks earlier, added approximately \$4.6 billion to the total. Injunctive relief totals vary widely from year to year depending on the timing of resolution of the largest cases.

➤ The total in FY 2011 is mainly due to one large company-wide air settlement (TVA; 26% of FY 2011 total) and two large municipal water settlements (City of Honolulu and NEORSD-Cleveland; both comprise 35% of FY 2011 total).

# FY 2014 Enforcement and Compliance Annual Results

## Administrative and Civil Judicial Penalties Assessed

FY 2010 – FY 2014



- In FY 2014, EPA obtained nearly **\$100 Million** in federal administrative and civil judicial penalties.
- The FY 2013 results were dominated by the record setting \$1 Billion penalty from Transocean in the Deepwater Horizon case.
- Penalties assessed vary widely from year to year depending on the timing of resolution of the largest cases.
- For example, a handful of large cases at the beginning of FY15 (shown in dotted bar) would have, if resolved just weeks earlier, made this our second highest civil penalty over the past five fiscal years.

Beginning in FY2011, and continuing through FY2015, EPA and the Department of Justice have made a significant investment in the Deepwater Horizon case, as evidenced by the more than \$1 Billion in civil penalties obtained in FY2013.

All prior FY dollar figures in this report are adjusted to reflect the current value in FY 2014 dollars based on the monthly rate of inflation/deflation as determined by the U.S. Department of Labor Consumer Price Index for All Urban Consumers.

Data Source: Integrated Compliance Information System (ICIS)  
Prepared by: OC/ETDD/DSIMB

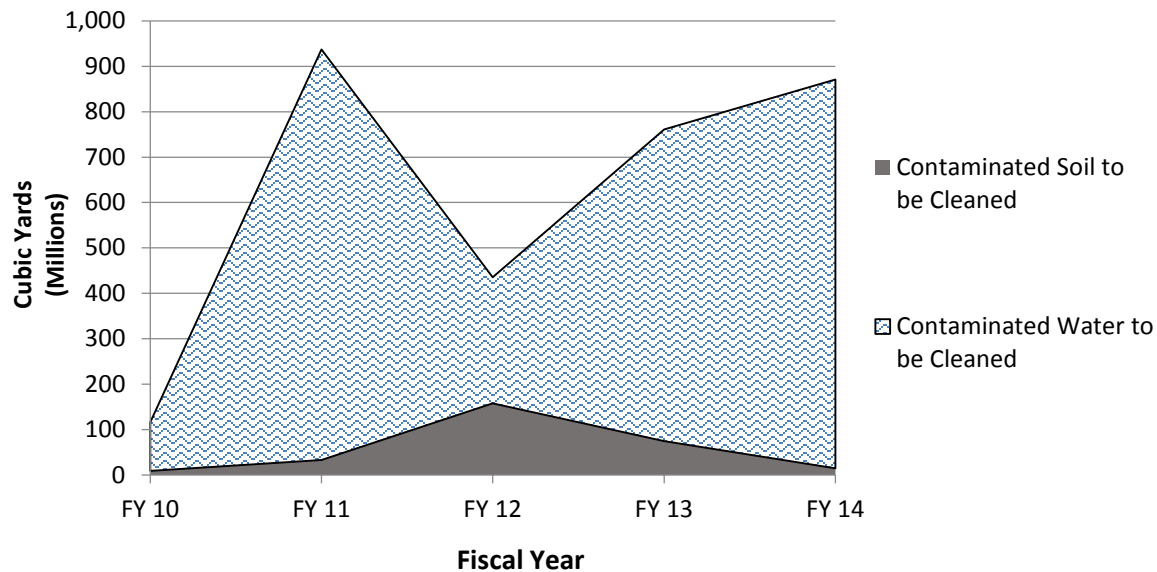


# FY2014 Enforcement and Compliance Annual Results

## Estimated Environmental Benefits

### Volume of Contaminated Water and Soil to be Cleaned Up

FY 2010 – FY 2014



Data Source: Integrated Compliance Information System.

Prepared by: OC/ETDD/DSIMB

November 7, 2014

➤ In FY 2014 the Agency obtained commitments to remediate an estimated **856 M cubic yards** of Contaminated Water/ Aquifer to be Cleaned Up (cubic yards).

➤ Milan Army Ammunition Plant (CERCLA), accounted for 798 M cubic yards of Contaminated Water/ Aquifer to be Cleaned Up (cubic yards).

➤ In FY 2014 the Agency obtained commitments to remediate an estimated **15 M cubic yards** of Contaminated Soil to be Cleaned Up (cubic yards).

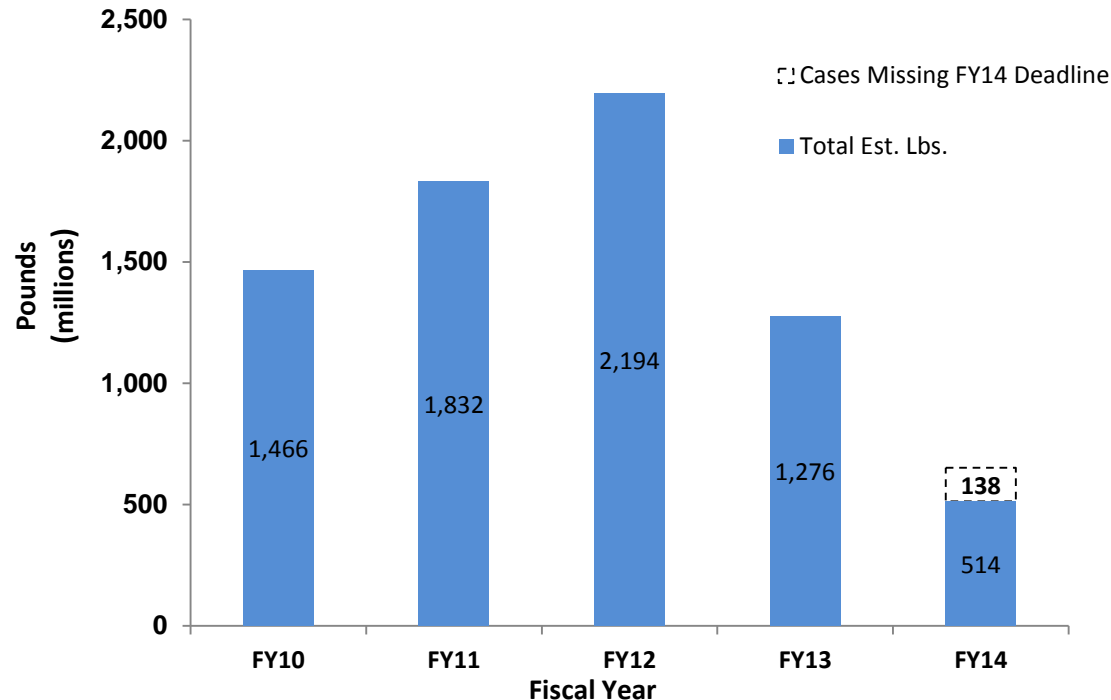
➤ These estimated benefits are the result of CERCLA and RCRA Corrective Action enforcement.

# FY 2014 Enforcement and Compliance Annual Results

## Estimated Environmental Benefits

### Commitments to Reduce, Treat, or Eliminate Pollution

FY 2010 – FY 2014



Data Source: Integrated Compliance Information System.

Prepared by: OC/ETDD/DSIMB

November 7, 2014

➤ In FY 2014, EPA enforcement actions required companies to commit to reduce pollution by an estimated **514 million pounds** per year.

➤ EPA enforcement addresses the biggest sources of pollution first. As a result, in the sectors responsible for the largest amounts of pollution reduced in prior years (e.g., coal fired power plants, raw sewage discharges), the amount of pollution reduced through EPA's enforcement cases will decline over time.

➤ EPA is increasing focus on air toxic pollution violations. In FY 14, EPA actions resulted in approximately 6.7 million pounds of air toxics reduced.

➤ Environmental benefits vary widely from year to year depending on the timing of resolution of the largest cases.

➤ A number of large cases at the beginning of FY15 (shown in dotted bar) would have, if resolved just weeks earlier, added approximately 138 million pounds to the total.

➤ Cases lodged early FY15 include 4.75 M metric tons of CO2 emission credits forfeited (not included in graph).

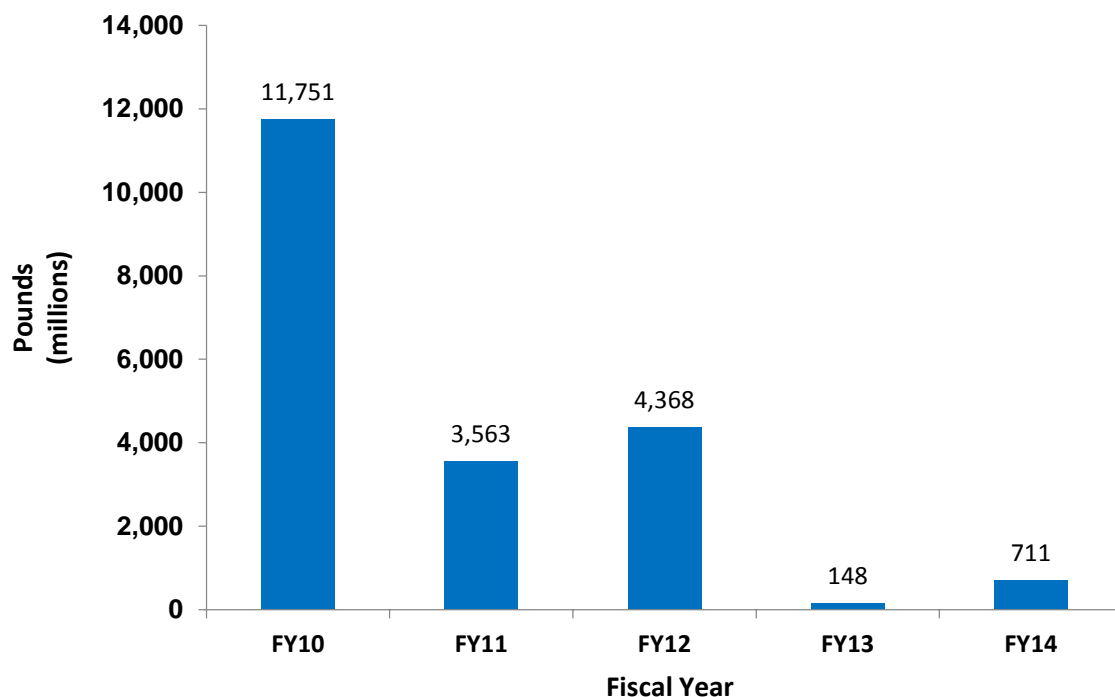


# FY2014 Enforcement and Compliance Annual Results

## Estimated Environmental Benefits

### Hazardous Waste Treated, Minimized, or Properly Disposed

FY 2010 – FY 2014



➤ In FY 2014, EPA enforcement actions required companies to commit to treat, minimize, or properly dispose of an estimated **711 million pounds** of hazardous waste.

➤ The hazardous waste metric is generally dominated by results from one or two very big cases. This results in substantial variability in this measure from year to year.

Data Source: Integrated Compliance Information System.

Prepared by: OC/ETDD/DSIMB

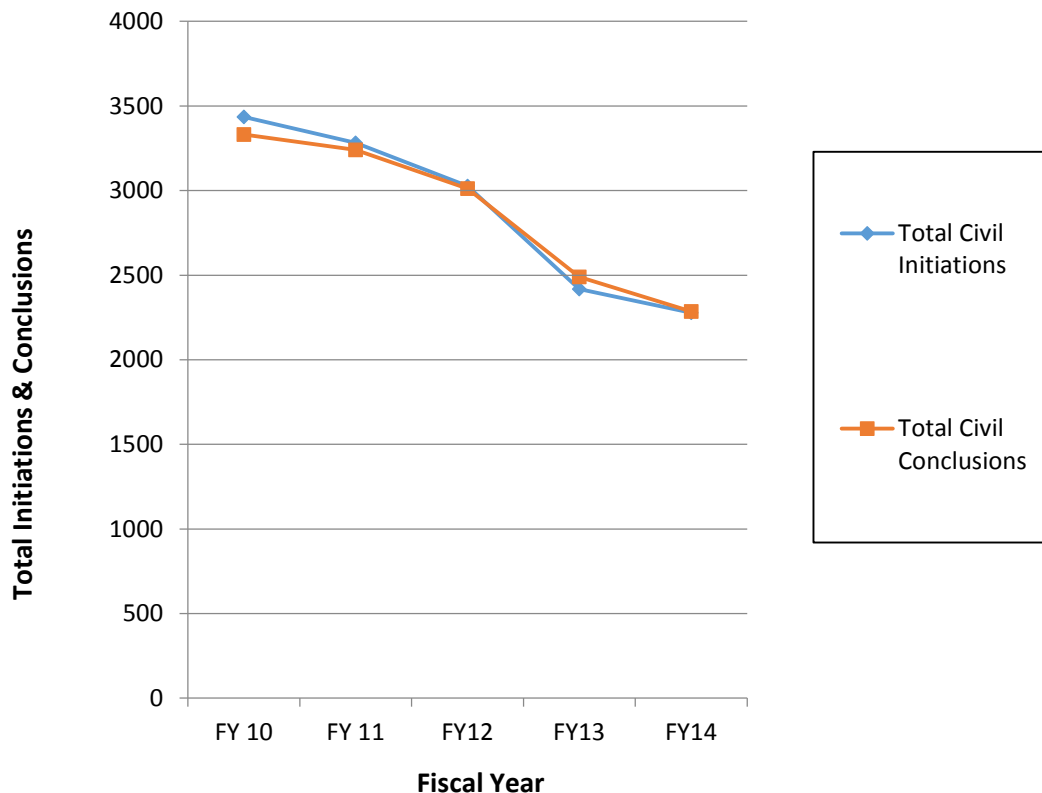
November 7, 2014



# FY2014 Enforcement and Compliance Annual Results

## Civil Enforcement Case Initiations and Conclusions

FY 2010 – FY 2014



➤ In FY 2014 EPA continued to pursue larger more complex, risk-based enforcement cases leading to significant environmental and health gains, but lower numbers overall.

➤ In FY 2014, EPA initiated a total of **2,278** civil judicial and administrative cases.

➤ In FY 2014, EPA concluded **2,286** civil judicial and administrative cases.

➤ Case numbers in FY14 were also affected by the shut down at the beginning of the year, in addition to budget reductions.

Data Source: Integrated Compliance Information System.

Prepared by: OC/ETDD/DSIMB

November 7, 2014



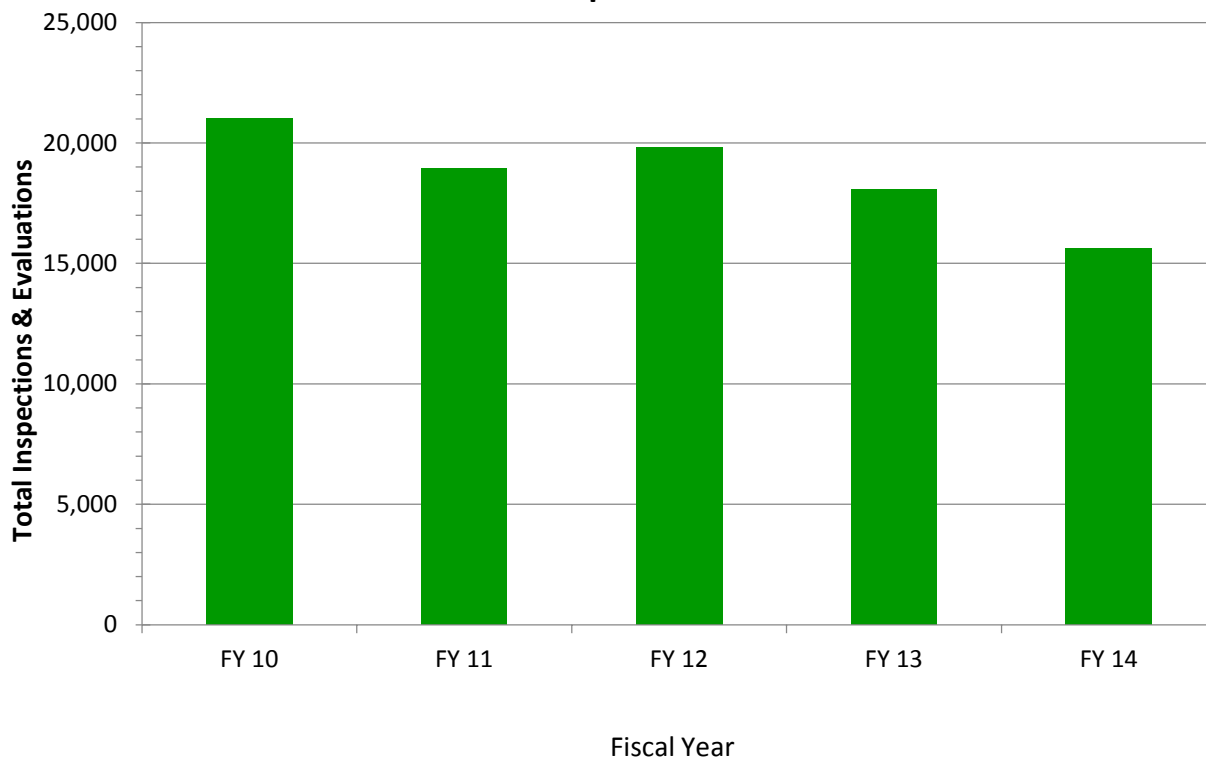
# FY 2014 Enforcement and Compliance Annual Results

Federal Inspections and Evaluations

(Conducted by EPA)

FY 2010 – FY 2014

## Federal Inspections and Evaluations



➤ In FY 2014, EPA conducted more than 15,600 inspections/evaluations.

➤ In light of tight budget circumstances, in FY 2014, EPA focused on inspections at larger facilities, leading to fewer inspections overall.

➤ Inspection numbers in FY14 were also affected by the shut down at the beginning of the year.

➤ EPA also continues to pursue additional means of gathering information about facility compliance, to supplement our on the ground inspections.

Note: There are other compliance monitoring activities conducted by the EPA that are not reflected in this chart such as civil investigations. The number of EPA Civil Investigations for the last five FYs are: 282 (FY 10), 177 (FY 11), 237 (FY 12), 103 (FY 13), 487 (FY 14).

Data Source: Integrated Compliance Information System (ICIS), ICIS-NPDES, AFS, RCRAInfo, and manual reporting.

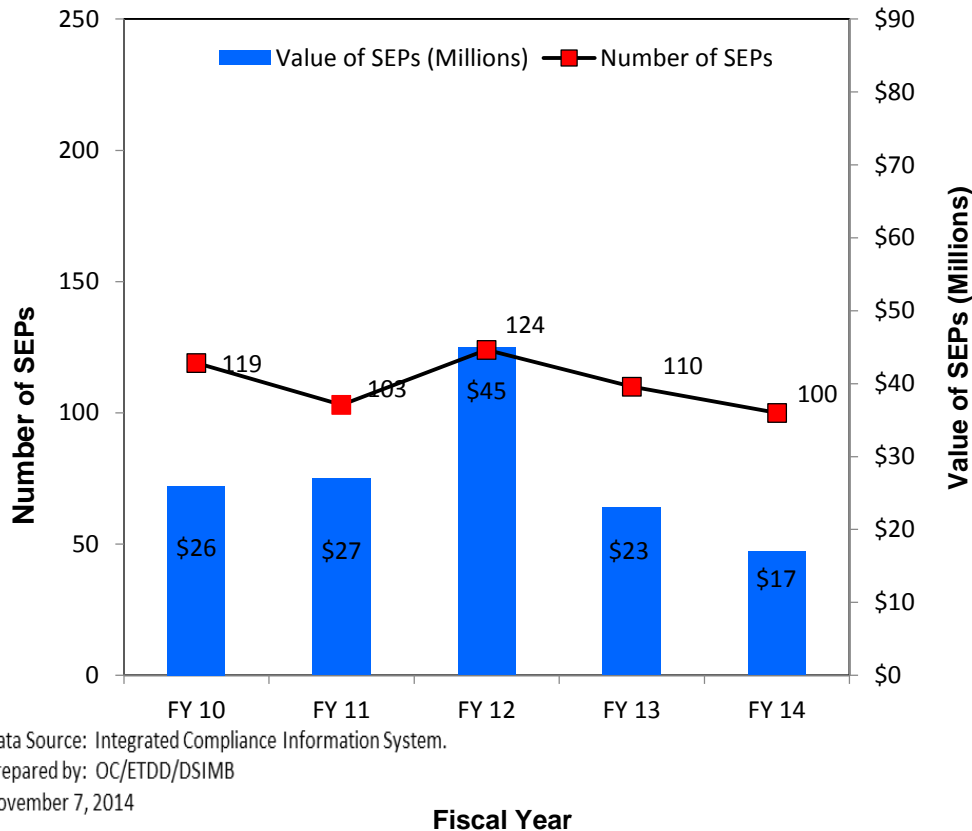
Prepared by: OC/ETDD/DSIMB

November 7, 2014

# FY 2014 Enforcement and Compliance Annual Results

## Supplemental Environmental Projects

FY 2010 – FY 2014



Data Source: Integrated Compliance Information System.

Prepared by: OC/ETDD/DSIMB

November 7, 2014

➤ In FY 2014, EPA enforcement actions resulted in more than an estimated **\$17 million** in Supplemental Environmental Projects (SEPs.)

➤ SEPs are projects that are not otherwise legally required, which a defendant/respondent agrees to undertake to benefit the community harmed by the violations (e.g., in a CAA case, the defendant may agree to retrofit diesel school buses, which reduces pollution and protects public health beyond the actions required in the injunctive relief portion of the settlement).

➤ The number and value of SEPs vary significantly from year to year. One or two large SEPs (e.g., one case in FY12 with an estimated value of \$20 million) can have a significant effect on the total SEP value.

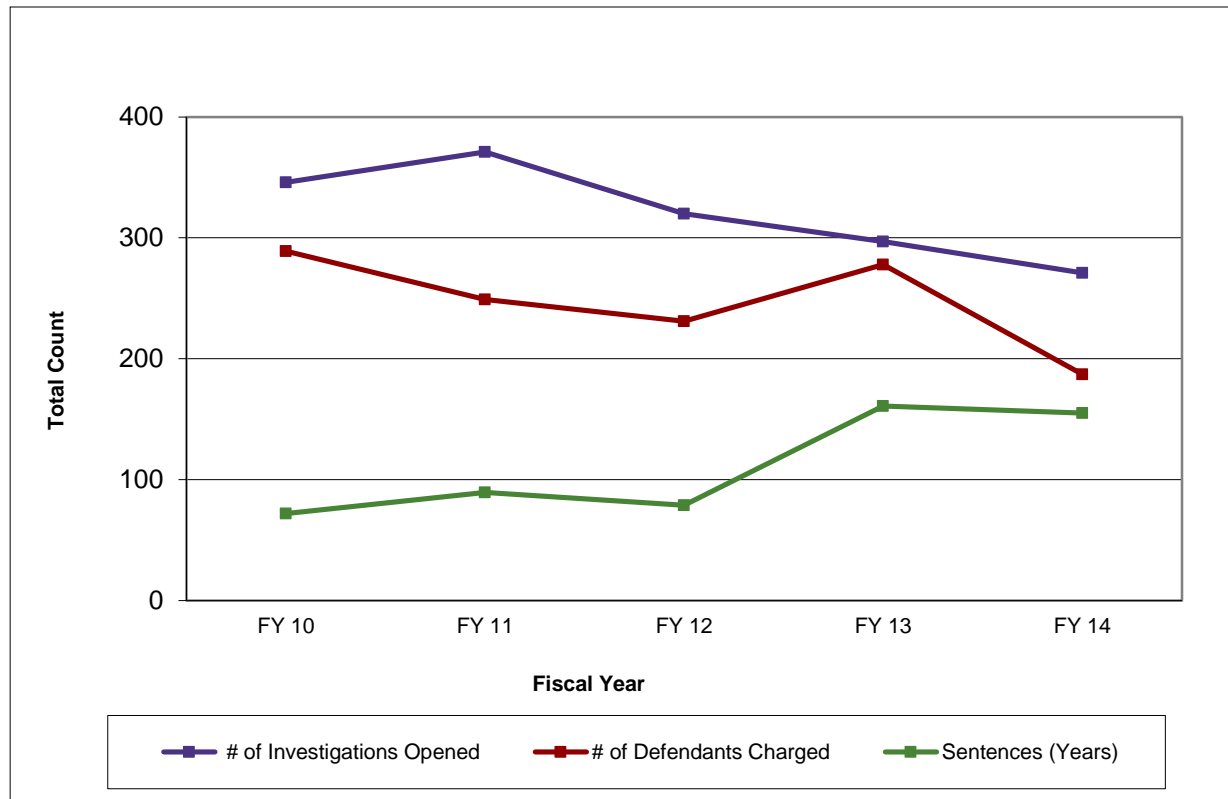
Note: All prior FY dollar figures in this report are adjusted to reflect the current value in FY 2014 dollars based on the monthly rate of inflation/deflation as determined by the U.S. Department of Labor Consumer Price Index for All Urban Consumers.



# FY 2014 Enforcement and Compliance Annual Results



## Criminal Enforcement Environmental Crime Cases Opened, Defendants Charged, and Sentencing Results – Years of Incarceration FY 2010 – FY 2014



- The criminal program continued in FY14 to focus on complex cases that involve a serious threat to human health and the environment or that undermine program integrity, resulting in fewer investigations overall.
- The focus on large and complex cases has led to continued high sentences in FY14, despite the drop in defendants charged.

Data Source: Criminal Case Reporting System  
Prepared by: OC/ETDD/DSIMB

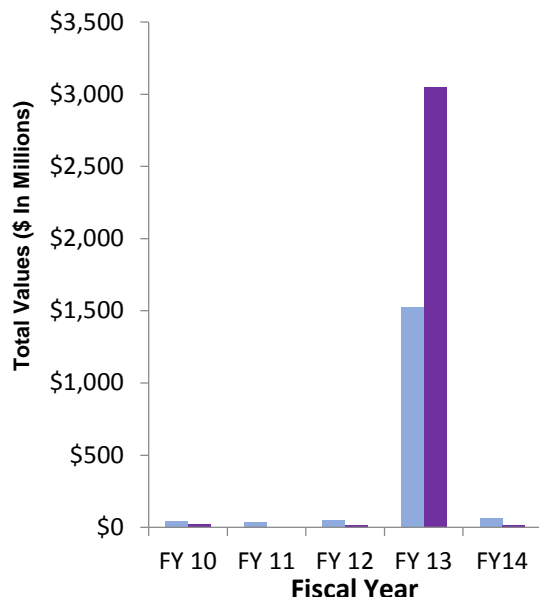
# FY 2014 Enforcement and Compliance Annual Results

## Criminal Enforcement

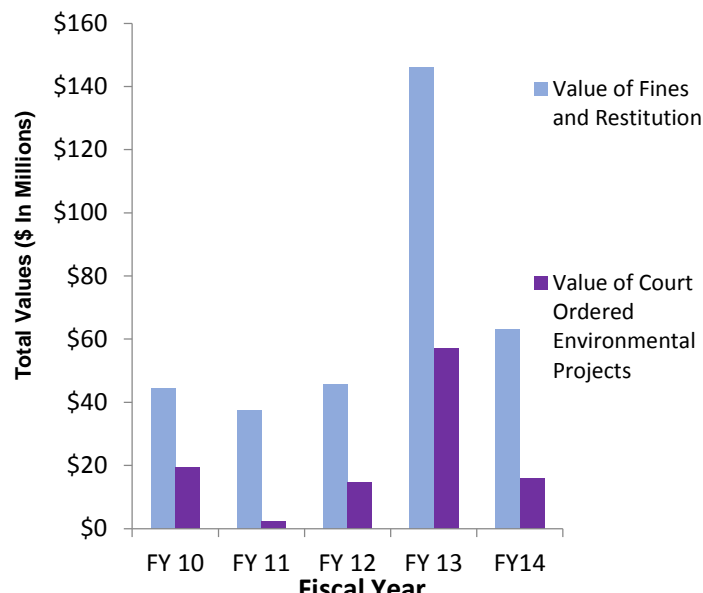
### Value of Fines and Restitution and Court Ordered Environmental Projects

FY 2010 – FY 2014

With FY13 Deepwater values



Without FY13 Deepwater values



➤ Criminal fines and restitution punish misconduct, deter other violators and, along with court-ordered environmental projects, help to remedy the harm caused by the criminal conduct.

➤ In FY 2014, the total of criminal fines, restitution and court ordered projects was \$80 Million.

➤ Significant criminal cases in FY 2014 included:

- Tonawanda Coke Corp.,
- P&W Waste Oil Services, Inc.,
- Citgo Petroleum Corp.

➤ In FY 2013, the inflation adjusted values for fines and restitution, and court ordered projects without the Deepwater Horizon amounts were \$144 million and \$56 million, respectively.

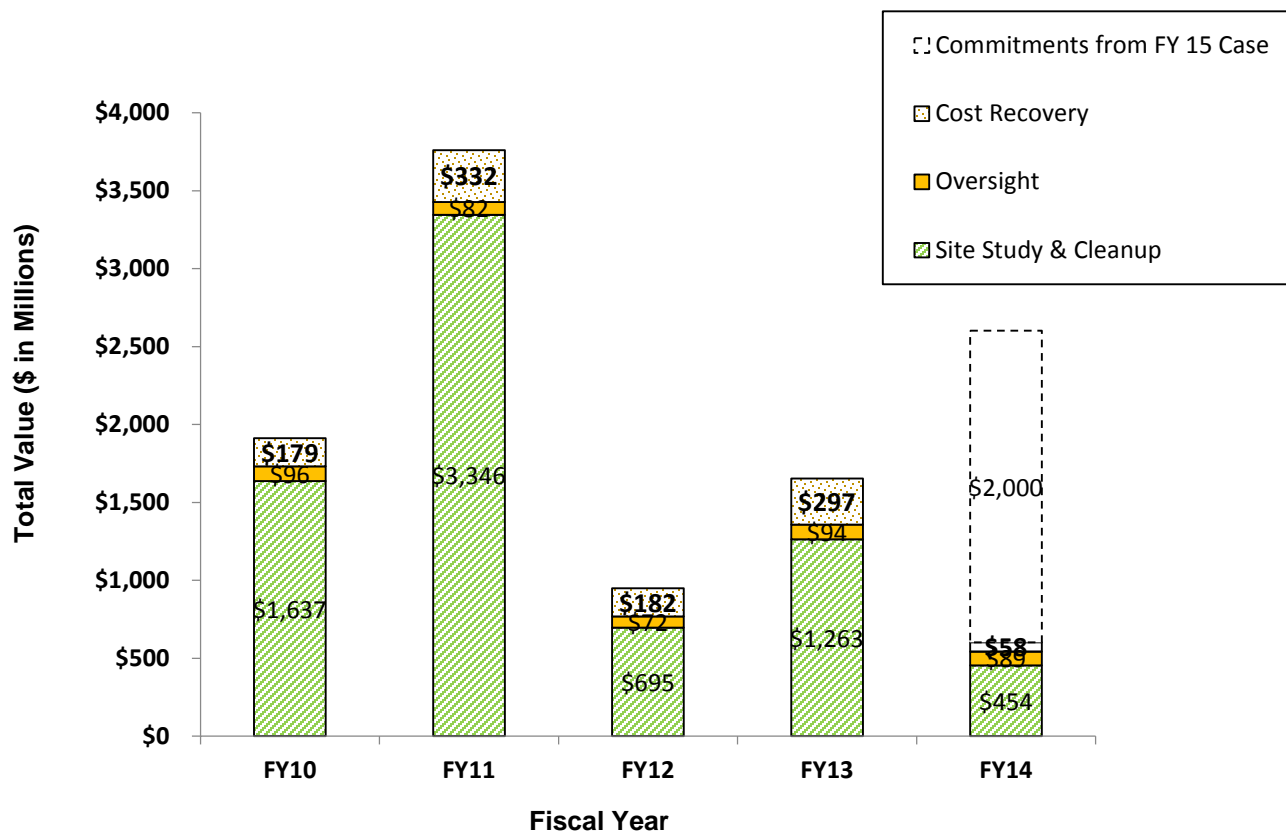
Note: All prior FY dollar figures in this report are adjusted to reflect the current value in FY 2014 dollars based on the monthly rate of inflation/deflation as determined by the U.S. Department of Labor Consumer Price Index for All Urban Consumers.

Data Source: Criminal Case Reporting System  
Prepared by: OC/ETDD/DSIMB

# FY 2014 Enforcement and Compliance Annual Results

## Superfund Results

### FY 2010 – FY 2014



- In FY 2014, private party cleanup commitments exceeded **\$600 million**. The total dollar value of cleanup commitments is driven by settlements requiring responsible parties to conduct or pay for cleanup.
- Cleanup commitments vary widely from year to year depending on the timing of resolution of the largest cases. This is especially clear this year, since the Anadarko case lodged in FY 14 (shown in dotted bar) would, if entered just weeks earlier, have significantly changed the number.
- The Anadarko case resulted in commitments of over \$4.4 billion for cleanups around the country; we only count \$2 billion in EPA's results because the remainder is going to fund state lead cleanups.

Note: All prior FY dollar figures in this report are adjusted to reflect the current value in FY 2014 dollars based on the monthly rate of inflation/deflation as determined by the U.S. Department of Labor Consumer Price Index for All Urban Consumers.

Note: Totals include "allowed claims" under bankruptcy settlements.

Data Source for Clean up and Cost Recovery: FY 2014 – Manual Reporting. Data source for previous fiscal years - Comprehensive Environmental Response, Compensation & Liability Information System (CERCLIS),

Data Source for Oversight: Integrated Financial Management System (IFMS); Data source for previous fiscal years: CERCLIS and IFMS.

Prepared by: OC/ETDD/DSIMB

12/15/2014



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# Cleanup Enforcement Program FY 2014 Accomplishments

The U.S. Environmental Protection Agency's (EPA) cleanup enforcement program protects human health and the environment by getting those responsible for a hazardous waste site to either clean up or reimburse EPA for its cleanup of sites and facilities.

Through the cleanup enforcement program, the Agency continues to pursue two strategies: "[Enforcement First](#)" and cost recovery, which provide money and commitments to clean up sites and conserve federal funds. EPA takes enforcement actions at sites where viable, potentially responsible parties (PRPs) exist, requiring them to pay for or perform site cleanups. Enforcement enables the Agency to focus appropriated funds on sites where PRPs either do not exist or lack the funds or capability to conduct site cleanups.

In fiscal year (FY) 2014, EPA obtained more than \$453.7 million in commitments from responsible parties to clean up Superfund sites. Additionally, responsible parties agreed to reimburse \$57.7 million of EPA's past costs from cleanup work at Superfund sites. Since 1980, EPA has attained over \$39 billion in commitments from responsible parties. Of this amount, more than \$32.9 billion has been committed to investigate and clean up Superfund sites, and more than \$6.4 billion represents reimbursements to EPA for its past costs.

The cleanup work commitments by PRPs will address 870 million cubic yards of contaminated soil and ground water. This amount exceeds the FY 2014 target of 225 million cubic yards. Of the 870 million cubic yards, 15 million cubic yards will address contaminated soil, which is enough to cover approximately 2,800 football fields with three feet of dirt, and 855 million cubic yards will address contaminated ground water, which is enough to fill approximately 260,000 Olympic sized swimming pools.

The cleanup enforcement program's FY 2014 accomplishments included work on landmark cases and addressing cleanup work and cost recovery as follows:

- [Working with the Department of Justice \(DOJ\) to secure more than \\$5 billion in a fraudulent conveyance claims case to address cleanup activity at over 2,700 sites in 47 states.](#)
- [Pursuing bankrupt companies for environmental liabilities at facilities and sites across the country.](#)
- [Promoting cleanup of contaminated sediment sites across the country.](#)
- [Developing a robust insurance practice accessing general liability insurance policies to recover cleanup costs.](#)

## Fraudulent Conveyance Settlement to Provide more than \$4.4 Billion for Environmental Cleanup

The vigorous pursuit of a fraudulent conveyance case associated with the Tronox bankruptcy proceedings resulted in the lodging of a settlement agreement that will secure more than \$4.4 billion for environmental cleanup at contaminated sites across the nation. The United States and the bankruptcy estate, represented by a trust, brought a lawsuit to hold Kerr-McGee Corporation and related subsidiaries of Anadarko Petroleum Corporation accountable and require them to repay the value of the assets fraudulently conveyed from the old corporate entity.

With the intent of evading environmental liabilities as well as other liabilities, Kerr-McGee created a new corporate entity (New Kerr-McGee), and in 2002 and 2005 transferred its valuable assets to the new company. The legacy environmental liabilities were left behind in the old company, which was renamed Tronox. As a result of these transactions, Tronox was rendered insolvent and unable to pay its environmental and other liabilities. In 2009, Tronox filed for bankruptcy. On February 11, 2011, Tronox resolved its environmental liabilities with EPA, other federal, state, and local agencies, and the Navajo Nation relating to numerous contaminated sites around the country. Specifically, the Tronox bankruptcy settlement provided \$270 million and 88% of Tronox's interest in the fraudulent conveyance case to the governments and bankruptcy-created trusts for cleanup costs incurred or to be incurred at these sites.

On April 3, 2014, the parties in the fraudulent conveyance case reached a settlement that, once approved, will provide more than \$4.4 billion for environmental cleanup. EPA will receive \$2 billion pursuant to the settlement. The settlement agreement was approved by the bankruptcy court on November 14, 2014. [More information from the fraudulent conveyance settlement case summary Web page.](#)

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#### **Bankruptcy Settlement with Kodak Secures over \$49 Million for Site and Facility Cleanups**

The cleanup enforcement practice includes seeking costs for past and future cleanup from parties who have declared bankruptcy. While bankruptcy law entitles a party to obtain a fresh start through the bankruptcy process, bankruptcy law also permits creditors, such as EPA, to assert and recover on claims that they may have against the bankrupt party. EPA vigorously pursues claims for cleanup at sites from PRPs who have filed for bankruptcy. EPA collects to the fullest extent it can on its claims in bankruptcy while still adhering to the rules and goals of bankruptcy law.

After the Eastman Kodak Company (Kodak) filed for bankruptcy on January 19, 2012, DOJ, on behalf of EPA, filed a proof of claim stating that Kodak has various obligations under the Resource Conservation and Recovery Act (RCRA) at the Eastern Business Park (EBP) and Genesee River in the City of Rochester, N.Y. and the Town of Greece, N.Y., and under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, commonly known as Superfund) at the Mercury Refining Superfund Site in Colonie and Guilderland, N.Y., and the Fairlawn Well Field Superfund Site in Fair Lawn, N.J.

On May 13, 2014, the U.S. Bankruptcy Court for the Southern District of New York approved three settlement agreements involving EPA, DOJ, Kodak, and the New York State Department of Environmental Conservation (DEC). The settlement agreements provide the following:

1. Kodak committed to fund a trust with \$49 million for cleanup at the EBP site and DEC agreed to fund any additional costs of cleanup between \$49 million and \$99 million. Any costs over \$99 million will be equally shared by Kodak and DEC.
2. EPA and DEC will investigate contamination in the Genesee River and implement the selected cleanup remedy.
3. For costs incurred in past cleanup work, Kodak will pay EPA \$2 million for the Fair Lawn site and approximately \$750,000 for the Mercury Refining site, plus additional amounts for each site pursuant to the terms of Kodak's plan of reorganization.

[Additional information is available from the Kodak bankruptcy settlement case summary Web page.](#)

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#### **Enforcement Mechanisms Work to Achieve Cleanup of Contaminated Sediment Sites**

EPA is actively promoting collaboration between the Clean Water Act (CWA) and Superfund at contaminated sediment sites across the country. The Superfund program is overseeing the cleanup of contaminated sediment sites costing hundreds of millions, and sometimes billions, of dollars. EPA and

the states are responsible for issuing water discharge permits that may impact the same sediments that a Superfund cleanup is remediating. The water program is also responsible for addressing impairments to waterways, some of which are linked to contaminated sediments. Controlling the source of pollutants is integral to both the CWA and Superfund programs.

Different types of enforcement mechanisms are used to help achieve our cleanup goals in these environments, including orders, settlement agreements, and consent decrees. EPA is encouraging collaboration between CWA implementers (EPA and states) and Superfund implementers to achieve more effective and sustainable results that meet the goals of both programs and protect human health and the environment.

Many of the contaminated sediment sites are in urban areas and ports. For example in FY 2014, EPA issued orders to multiple PRPs, including the City of New York, to address the significant historic and ongoing sediment contamination at the [Gowanus Canal Superfund Site](#). Completed in 1869, the Gowanus Canal was once a major transportation route for the then separate cities of Brooklyn and New York City, N.Y. As a result of years of discharges, storm water runoff, sewer outflows and industrial pollutants, the Gowanus Canal has become one of the nation's most extensively contaminated water bodies.

Under the orders, the settling parties will conduct remedial design at the Gowanus Canal site. Remedial design is the phase in Superfund site cleanup where the technical specifications for cleanup remedies and technologies are developed. Additional information on the orders is available from the [case summary on the Gowanus Canal remedial design orders](#).

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#### **Agency's Cost Recovery Efforts include Investigation of General Liability Insurance Policies**

EPA continues to successfully pursue old general liability insurance policies, issued to responsible parties for recovery of cleanup costs when the responsible parties cannot pay because of insolvency, bankruptcy, or other financial hardship. In FY2014, over \$15 million in settlements were negotiated and will be recovered through these insurance policies. From 2006 to 2013, EPA recovered approximately \$86 million through negotiated insurance settlements for a total of over \$100 million.

While the primary focus of EPA's insurance recovery practice remains on older commercial general liability policies, the Agency has recently enhanced its expertise in pursuing modern environmental impairment liability policies.

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Information on the Agency's cleanup enforcement program is available from the Agency's [Waste, Chemical, and Cleanup Enforcement website](#).

Summaries of cases and settlements for FY 2014 are available on the Agency's [Cases and Settlements Database](#).

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# 2014 Major Criminal Cases

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## Clean Air Act

### Tonawanda Coke Gets One of Largest Air Pollution Fines Levied At a Federal Criminal Trial

In March 2014, Tonawanda Coke Corporation (TCC) was ordered to pay a \$12.5 million penalty and make \$12.2 million in community service payments for criminal violations of the Clean Air Act (CAA) and the Resource Conservation and Recovery Act (RCRA). TCC was convicted by a federal jury in March 2013 on 11 counts of violating the CAA and three counts of violating the RCRA. The fine is one of the largest fines ever levied in an air pollution case involving a federal criminal trial. The company's environmental control manager, Mark L. Kamholz was convicted of 11 counts of violating the CAA, one count of obstruction of justice and three counts of violating the RCRA, and was sentenced to one year in prison, 100 hours of community service, and a \$20,000 fine.

The environmental control manager was convicted of 11 counts of violating the Clean Air Act, one count of obstruction of justice, three RCRA violations, and was sentenced to one year in prison, 100 hours of community service, and a \$20,000 fine.



According to evidence presented at trial, Tonawanda Coke released coke oven gas containing benzene into the air through an unreported pressure relief valve. In addition, a coke-quenching tower was operated without baffles, a pollution control device required by TCC's Title V Clean Air Act permit designed to reduce the particulate matter that is released

into the air during coke quenches. In addition, prior to an inspection conducted by EPA in April of 2009, Kamholz told another TCC employee to conceal the fact that the unreported pressure relief valve, during normal operations, emitted coke oven gas directly into the air, in violation of the TCC's operating permit.

Tonawanda Coke and Kamholz also stored, treated and disposed of hazardous waste without a permit to do so, in violation of RCRA. These offenses related to Tonawanda Coke Company's practice of mixing its coal tar sludge, a listed hazardous waste that is toxic for benzene, on the ground in violation of hazardous waste regulations. For more information, [read the complete case summary.](#)

### Citgo Sentenced to Pay More than \$2 Million for Environmental Crimes at Corpus Christi Refinery

CITGO Petroleum Corporation and CITGO Refining and Chemicals Company LLP were sentenced in February 2014 to pay a fine of \$500,000 on each of the two Clean Air Act counts of conviction. CITGO Refining and Chemicals Company LLP was ordered to pay a fine of \$500,000 on each of the federal Clean Air Act counts of conviction plus \$15,000 on each of the three misdemeanor Migratory Bird Treaty Act conviction, for a total of \$45,000.



The violations related to Citgo's illegal operation of two massive tanks at its Corpus Christi East Plant Refinery between January 1994 and May 2003. The tanks were operated as oil water separators and required emission control equipment, which Citgo did not have. The failure to equip the tanks with emission controls exposed numerous residents in the Oak Park and Hillcrest communities to chemical emissions. Approximately 80 victims appeared in the full court room. For more information, [read the complete case summary](#).

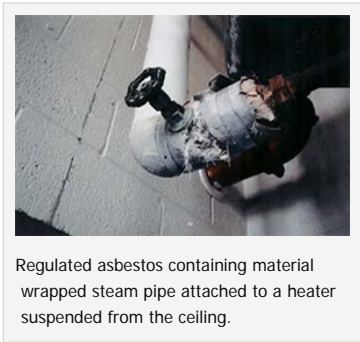
### California Men Sentenced for Asbestos Abatement Violations at Former Air Force Base

Patrick Bowman and Rudolph Buendia III were sentenced in March 2014 for violating the asbestos work-practice standards of the National Emissions Standards for Hazardous Air Pollutants. Bowman was sentenced to 27 months in prison and Buendia to 24 months in prison. Sentencing is pending for another defendant, Joseph Cuellar. A restitution hearing as to all three defendants is also pending.



Joseph Cuellar was the administrative manager of Firm Build Inc., Patrick Bowman was its president, and Rudolph Buendia was its construction project site supervisor. From September 2005 to March 2006, Firm Build operated a demolition and renovation project in the former Castle Air Force Base in Atwater, California. They were to turn a building into a mechanic training center and hired local high school students from the Workplace Learning Academy in Merced to perform some of the renovation.

According to court documents, the students and other employees removed and disposed of approximately 1,000 linear feet of pipe insulation and additional tank insulation which the defendants knew contained regulated asbestos-containing material without utilizing proper protective equipment (in the form of Tyvek suits, full-face respirators, bootie or footwear coverings, gloves, hair hoods or caps, and shower equipment) or taking protective measures (wetting the asbestos containing materials, sealing the asbestos debris in secure plastic bags, using negative air pressure in the building) in violation of federal law. Asbestos became air-borne during this illegal asbestos abatement. In performing the asbestos abatement project in this manner, defendants knowingly exposed Firm Build employees, Workplace Learning Academy students, as well as other subcontractors and their employees to hazardous airborne asbestos. For more information, [read the complete case summary](#).



### Texas Man Gets Jail Time and Ordered to Pay Restitution in Fraud Case

In August 2014, Michael G. Johnson was sentenced to 28 months in federal prison and ordered to pay \$354,529 in restitution, following his guilty plea in January 2014 to felony offenses stemming from an EPA investigation into violations of the Clean Air Act. Specifically, Johnson pleaded guilty to one count of wire fraud and one count of making false statements under the Clean Air Act. He has been in federal custody since his arrest in July 2013.

From 2007 through 2009, Johnson owned and operated System Launch Associates from an apartment in Fort Worth, TX. After 2009, Johnson conducted business from Austin, Texas; Dallas, Texas; Sterling Heights, Michigan; and Miles City, Montana. Pursuant to the Clean Air Act, manufacturers are prohibited from selling a vehicle or engine that is subject to emission standards unless the vehicle or engine is covered by an EPA-issued Certificate of Conformity. System Launch purported to arrange testing of new vehicles and new vehicle engines for U.S. distributors of foreign-made vehicles. System Launch itself, however, did not perform the testing. In fact, the testing was never done, and Johnson fabricated the testing data.



Example of a vehicle owned by victim distributors. The vehicles were "tested" by Systems Launch and issued certificates of conformity. EPA officially informed the distributors that the tests were falsified and that they cannot sell them in the U.S.

Johnson instructed his clients to have the vehicles delivered to him or to a test lab he chose, instructing them to pay half of the testing/application fee to him upfront and the remainder when the testing was completed. After Johnson submitted the completed Certificate of Conformity application to the EPA, he provided a copy of the fraudulent vehicle test data to his clients. From August 2009 through June 2012, Johnson submitted multiple Certificates of Conformity applications containing fraudulent vehicle test data to the EPA and delivered that data to more than a dozen clients. The applications Johnson submitted were approved, and the EPA issued Certificates of Conformity based on fraudulent data he provided. For more information, [see the complete case summary](#).

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### Clean Water Act

#### Ohio Company Owner Sentenced to More Than Two Years in Prison for Discharging Fracking Waste into River Tributary

Benedict W. Lupo, the owner of Hardrock Excavating LLC, was sentenced in August 2014 to 28 months in prison and fined \$25,000 for violating the Clean Water Act by dumping fracking waste into a tributary of the Mahoning River. Lupo was found guilty earlier of one count of making an unpermitted discharge. The illegal discharges took place more than 30 times between November 1, 2012 and January 31, 2013. Lupo's company provided services to the oil and gas industry in Ohio and Pennsylvania, including the storage of brine and oil-based drilling mud used in



The storm sewer outfall in which Lupo directed an employee to discharge waste liquid. The outfall ultimately flows into the Mahoning River.

hydrofracturing, or fracking.

On or about November 1, 2012, Lupo directed employees to empty some of the waste liquid stored at the facility into a nearby wastewater drain. There were approximately 58 mobile storage tanks at the facility and each holds approximately 20,000 gallons. Lupo directed the employees to conduct this activity only after no one else was at the facility and only after dark. On numerous occasions over the next several months, Lupo directed employees to empty some of the waste liquid into a nearby stormwater drain using a hose. The drain flowed into a tributary of the Mahoning River and ultimately into the Mahoning River. The last time an employee emptied some of the waste liquid into the drain was on or about Jan. 31, 2013. The waste liquid that night included brine and drill cuttings. A sample of the discharge taken that night was black in color and a subsequent analysis showed the presence of several hazardous pollutants, including benzene and toluene. Mark Goff and Michael Guesman previously pleaded guilty to their roles in the crime and were each sentenced to three years of probation and 300 hours of community service. For more information, [see the complete case summary](#).

**Unilever Pays \$4.5 Million for Violating CWA at Connecticut Facility**

Unilever Home & Personal Care USA was sentenced in April 2014 to three years of probation and fined \$1 million for violating the Clean Water Act at its former manufacturing site in Clinton, Connecticut, in 2008. As part of the resolution of this case, Unilever also is contributing \$3.5 million to state and local environmental programs, and instituting a new environmental compliance program at its U.S. manufacturing facilities. Unilever's Clinton manufacturing facility produced a variety of health and beauty products for sale in the United States. The wastewater produced by the plant was regulated by a permit that prohibited the company from bypassing any portion of its wastewater treatment system unless the bypass was unanticipated, unavoidable, and necessary to prevent loss of life, personal injury or severe property damage. The permit further required that Unilever notify authorities within two hours of becoming aware of any bypass, and submit a written report within five days setting forth the cause of the problem, the duration of the event including dates and times, and corrective actions taken or planned to prevent future occurrences.

On December 5, 2008, a third party contract employee noticed that a hose was being used to bypass the industrial process wastewater treatment system by allowing the contents of a 4,500 gallon vacuum filter filtrate tank to discharge directly to a storm drain pipe that led to Hayden Creek. Upon making this discovery, the contract employee alerted the junior wastewater treatment operator for the Clinton facility and



showed him the hose and ongoing wastewater bypass. These two individuals then shut off the hose. The contract employee then notified his non-Unilever supervisor about his observations, and was urged to notify the Safety, Health and Environmental (SHE) manager of the Clinton facility. The SHE manager notified the plant manager, took pictures, and observed the downstream oil/water separator. Despite the requirement that the Connecticut Department of Energy and Environmental Protection (DEEP) be notified within two hours of the detection of such a bypass, Unilever chose not to notify the DEEP within this two-hour window.

On December 8, 2008, three days after being notified of the illegal discharge, the Unilever plant manager interviewed the two wastewater treatment operators and the contract employee who had initially discovered the bypass. All three individuals denied any responsibility for the bypass and indicated that they did not know who was responsible, although the contract employee again stated that he believed that the

senior operator was responsible. Unilever conducted its own internal investigation of the December 2008 incident. In subsequent conversations and written communications with federal and state authorities throughout 2009 and 2010, Unilever claimed it was unable to conclusively determine who was responsible for the bypass, and mischaracterized the incident as an isolated, "one-off" incident that may have been the work of unknown "vandals."

An extensive EPA investigation revealed the truth about what had happened. The junior operator admitted to the EPA that he intentionally bypassed the system on December 5. EPA further concluded that for an extended period of time, perhaps as long as two years prior to December 2008, the wastewater treatment operators routinely bypassed the system on a weekly basis, discharging approximately 1,500 gallons of partially treated wastewater at a time to the storm drain that led to Hayden Creek. EPA's investigation established that these bypasses were concealed from and unknown to Unilever management, including the SHE manager and the plant manager. Unilever's management was aware, however, both that the operators were not properly overseeing the wastewater treatment system and that the system was not properly functioning. In December 2012, Unilever ceased manufacturing operations at the Clinton facility. For more information, [see the complete case summary](#).

#### Illinois Gear Manufacturing Firm Agrees to \$1.5 Million CWA Fine for Illegal Discharges into Public Sewer System

Brad Foote Gear Works, Inc, a suburban Cicero, Illinois, gear manufacturing company, agreed to pay a \$1.5 million fine in February 2014 for illegally discharging industrial wastewater into a public sewer system. Under terms of the agreement, Brad Foote will pay the fine in three \$500,000 installments over three years. Brad Foote pleaded guilty in November 2013 and began cooperating with the government and taking remedial water treatment measures after federal environmental agents executed a search warrant in February 2011.



Totes containing acid wastes at Brad Foote Gear Works, Inc.

Brad Foote Gear Works pleaded guilty to one count of violating the federal Clean Water Act on at least 300 separate days between April 2007 and February 2011. The company, which manufactures precision gear parts for wind turbines, among other things, admitted illegally discharging spent acid wastewater and spent alkaline wastewater, industrial rinse waters, acidic solutions, oil, grease, and metal bearing wastewater into the Metropolitan Water Reclamation District of Greater Chicago sewer system without a permit. The wastewater was received at the MWRDGC's Stickney Water Reclamation Plant in southwest Chicago, where it was treated and discharged into the Chicago Sanitary and Ship Canal.

Following the search of its premises in February 2011, the company began cooperating and implementing protocols to ensure the proper discharge and disposal of industrial wastewater from its facility. As a result, the government did not seek a court-imposed corporate compliance agreement. According to the plea agreement, Brad Foote's manufacturing operations included a nital etch line, in which finished parts were dipped into a series of tanks containing caustic cleaners, rinse waters, and nitric acid and hydrochloric acid solutions. The etching acids and caustic cleaners of the nital etch line generally exhibited impermissibly low acidic solutions and impermissibly high alkaline solutions and, over time, those solutions and rinse waters became "spent," meaning they lost their effectiveness and needed to be replaced.



Beginning in 2004, the company's then chief executive officer and the manager of the nital etch line created a piping system that allowed untreated wastewater to be discharged into the public sewer system. The discharged wastewater from acid and alkaline tanks generally exhibited a pH of less than 2.0 or greater than 10.5. A second source of illegal discharge involved the company's "Superfinish" process that used chemicals and abrasive sand-like material to smooth and polish gear parts. As a significant industrial user, Brad Foote was required to have a valid discharge authorization permit to discharge these wastewaters into the sewer system. Brad Foote knew that it did not have, and never applied for, a discharge authorization permit. For more information, [see the complete case summary](#).

**Alabama Real Estate Developer Sentenced to Jail for Filling Protection Mississippi Wetlands**

William R. "Rusty" Miller, a real estate developer from Fairhope, Alabama, was sentenced in April 2014 for the unpermitted filling of wetlands near Bay St. Louis, Mississippi, in violation of the Clean Water Act. Miller was sentenced to serve 15 months, with nine months in prison and six months in home confinement, to be followed by one year of supervised release. He was also ordered to pay a \$15,000 fine and to pay \$19,246 in restitution. Miller admitted to having caused the excavation and filling of wetlands on a 1,710 acre parcel of undeveloped property in Hancock County, Mississippi. Miller was identified as a part-owner of corporations that purchased and intended to develop the land.



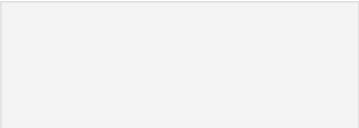
Dredged material that was placed in wetlands and an aerial perspective of the disturbance.

According to the felony information, in 2001 when Miller and his companies acquired the property, he was informed by a wetland expert that as much as 80 percent of the land was federally protected wetland connected by streams and bayous to the Gulf of Mexico and as such could not be developed without a permit from the U.S. Army Corps of Engineers. In spite of this notification, Miller hired excavation contractors to trench, drain and fill large portions of the property to lower the water table and thus to destroy the wetland that would otherwise be an impediment to commercial development.; In pleading guilty, Miller has acknowledged that he knowingly ditched, drained and filled wetlands at 10 locations on the Hancock County property without having obtained a permit from the U. S. Army Corps of Engineers.

Hancock County Land LLC (HCL), the principal owner of the land, previously entered a guilty plea to related charges. The corporation was ordered to pay a total penalty of \$1 million and ordered to perform community service by completing wetland restoration and preservation plans ordered by the court. These require the defendant to replant with appropriate native vegetation the wetland area it excavated and filled, donate approximately 272 acres of the southwest quadrant to the Land Trust for the Mississippi Coastal Plain to be preserved in perpetuity, to fund its management and maintenance, to pay \$100,000 toward the litigation costs of the Gulf Restoration Network and to pay a civil penalty to the United States Treasury for the amount of \$95,000. For more information, [see complete case summary](#).

**Washington State Man Gets Prison Term for Illegal Sewage Dumping Scheme**

In April 2014, Ray Caldwell and his company, All-Out Sewer and Drain Service, Inc., a septic tank pumping business, of Longview, Washington,



were sentenced for multiple felony criminal violations of the Clean Water Act. Caldwell was sentenced to 27 months in prison, three years of supervised release, and a fine of \$250,000 for twenty-five counts of violating the Clean Water Act, six counts of mail fraud, and two counts of making false statements. The company shares in the \$250,000 fine and will be on probation for three years.



Video surveillance image that captured an illegal discharge occurring at All-Out Sewer and Drain Service, Inc. Encircled area shows hose from tank inserted into drain.

According to records filed in the case, the defendants' scheme to defraud the City of Longview, Cowlitz County, and the Three Rivers Regional Wastewater Authority went on for more than ten years. All-Out was engaged in the business of pumping, hauling, and disposing of septic tank waste, grease trap waste, and industrial wastewater. It was All-Out's practice to transport the waste to its facility in Longview where it was minimally treated and stored in a 10,000 gallon storage tank. While some of the tank contents were appropriately trucked to approved treatment facilities, a majority of the commingled waste was routinely dumped down an unauthorized sewer port located on the All-Out facility.

Based on video surveillance footage seized by law enforcement authorities, Caldwell and his business partner, Randy Dingus, undertook the illegal discharges in the early morning hours, under the cover of darkness, to avoid being detected by passersby or unsuspecting employees. When a records review conducted by the City of Longview in 2010 threatened to expose the scheme, the defendants began submitting false documents underreporting the true volume of trucked and hauled waste. This deception worked until August 2012 when law enforcement surveillance activities prompted by citizen complaints revealed the early morning dumping. For more information, [see the complete case summary](#).

### Former Illinois Village Water Officials Sentenced for Concealing Village's Use of Well in Drinking Water Supply

Frank Scaccia, a retired certified water operator, and Theresa Neubauer, former water department clerk and supervisor and, later, police chief of the southwest suburban village of Crestwood, Illinois, were each sentenced in November 2013, to two years' probation for lying repeatedly to environmental regulators for more than 20 years about using a water well to supplement the village's drinking water supply. The defendants, effectively thwarted the government from implementing the federal Safe Drinking Water Act's notice and testing requirements designed to ensure the safety of municipal water supplies. In addition to probation, Scaccia was ordered to serve the first six months in home confinement. He pleaded guilty on April 11, 2013, to making false statements. Neubauer was fined \$2,000 and ordered to perform 200 hours of community service. She was convicted by a jury on April 29, 2013, of 11 counts of making false statements after a week-long trial.

Both defendants concealed the village's use of its well from the government and the citizens of Crestwood to save money. By doing so, the village didn't properly monitor for contaminants that could have been introduced to Crestwood's water supply, avoided having to fix its leaking water distribution system, or paying the neighboring village of Alsip more money for water drawn from Lake Michigan. Due to Crestwood's use of Well



The pump that the Village of Crestwood

#1, an unmonitored and unreported water source, the village should have periodically tested its drinking water for organic contaminants, inorganic contaminants, and radiological contaminants beginning in the 1970s. Between 1987 and 2008, Scaccia and Neubauer were among a small circle of trusted village, who concealed that Crestwood was supplementing its Lake Michigan water with water drawn from Well #1

used to draw water from an underground aquifer, which was used to supplement their drinking water drawn from Lake Michigan. This picture was taken after the pump was already disconnected from the well and taken out of service.

According to court records and the evidence at trial, since at least 1973, the substantial majority of Crestwood's drinking water came from Lake Michigan and was purchased from neighboring Alsip, which, in turn, had purchased the water from the city of Chicago after it was treated and tested pursuant to state and federal environmental regulations. Since 1982, Crestwood regularly supplemented the Lake Michigan water with water drawn from an underground aquifer through a well located on Playfield Drive, known as Well #1. Crestwood found it necessary to supplement the Lake Michigan water with water pumped from Well #1, in part, because of substantial leakage in its water distribution system, which Crestwood officials failed to adequately repair. For more information, [see the complete case summary](#).

#### Kentucky Oil Well Operators Sentenced for Violations of the Safe Drinking Water Act

Charles L. Stinson and Ralph Dowell operators of Logsdon Valley Oil Co. Inc., were sentenced to two years' probation in January 2014 for violations of the Safe Drinking Water Act. Stinson and Logsdon Valley Oil Co. Inc., were ordered to pay fines for the continued conspiracy to inject fluids, without a permit, into sinkholes and wells in Hart County, Kentucky, from March 13, 2008 through July 18, 2012.

According to the plea agreement, Stinson and Logsdon Valley Oil Co. Inc., agreed to a fine of \$45,000 to be paid at sentencing. According to the terms, Stinson was to pay the fine personally, with \$25,000 paid to the Commonwealth of Kentucky, \$10,000 to the EPA and \$10,000 to the United States. Also, as part of the terms, Stinson agreed to provide adequate documentation to EPA that the Stinson #6 (the well-used for illegal injection) is plugged and abandoned in such a manner that protects underground sources of drinking water from contamination. Stinson and Dowell pleaded guilty to violating a requirement of an applicable underground injection control program. Specifically, they configured piping to inject produced brine water (fluids brought to the surface in connection with oil production) from the tank battery to sinkholes, and injected produced brine water into a sinkhole, and conveyed fluids into sinkholes. For more information, [see the complete case summary](#).

#### Oklahoma-based oil and gas Production Company ordered to pay \$1M for 2011 oil spill

In January 2014, Nadel and Gussman Rockies, LLC, (NGR), an oil and gas production company based in Tulsa, Oklahoma, was ordered to pay a total of \$1 million in fines, restitution and community service contributions after previously leading guilty to Clean Water Act violations stemming from its role in the illegal discharge of more than 4,700 gallons of crude oil into a tributary of the North Platte River near Rawlins, Wyoming. The company was also required to implement a new compliance program to ensure future compliance with all environmental laws and regulations applicable to oil and gas companies leasing lands from the federal government.

NGR was ordered to pay a \$357,500 criminal fine and a total of \$430,500 in restitution, of which \$200,000 will go to the Oil Spill Liability Trust Fund, a federal fund used to finance oil spill response activities and provide compensation for damages. The remaining \$230,500 will go to Carbon County, Wyoming, the county in which the oil spill occurred. Of that amount, \$80,500 will be used to purchase equipment and supplies

necessary to responding to and cleaning up oil spills in the county, while the remaining \$150,000 will be equally distributed to the Little Snake River, Saratoga-Encampment-Rawlins, and Medicine Bow Conservation Districts to improve water quality and conserve local natural resources. NGR will also make a community service payment of \$212,000 to be divided equally between the Yellowstone Park Foundation and the Grand Teton National Park Foundation for projects to enhance, protect and preserve the natural resources of each park.

The case began in May 2011 when a local resident noticed an oily sheen on Emigrant Creek near Rawlins. BLM employees confirmed there had been a discharge of oil into the creek and that it appeared to have originated from an oil tank storage system owned and operated by NGR. BLM requested EPA's assistance for emergency clean-up. A joint criminal investigation conducted by EPA's Criminal Investigation Division and BLM's Special Investigation Group later determined that Patrick Ely, an independent contractor for NGR, routinely drained production water from NGR's tank system directly to the ground as authorized by NGR Operations Manager, Hugo Cartaya. As a result, about 375,000 gallons of production water containing high levels of arsenic and 113 barrels of oil – approximately 4,746 gallons – were discharged in mid-April, 2011. Although Ely reported the oil spill to NGR Operations Manager Hugo Cartaya, the spill went unreported to the National Response Center until directed by the BLM and EPA. NGR pleaded guilty in November 2013 to violating the CWA by negligently discharging a harmful quantity of oil into a waterway under federal jurisdiction. In April 2014, Cartaya was sentenced to serve three years of supervised probation, was ordered to serve 250 hours of community service, and was ordered to pay a \$10,000.00 fine after pleading guilty to making false statements. For more information, [see the complete case summary](#).

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## Resource Conservation and Recovery Act (RCRA)

### Georgia Hazardous Waste Transporter Sentenced

Robert Lewis, was sentenced in March 2014 to serve 10 months in federal prison for the unlawful storage of hazardous waste. Lewis entered a guilty plea to the charges in September 2013. In his plea agreement, Lewis admitted that he owned and operated a waste hauling business under the name of Simple Solutions, Inc. From about May 2007 until April 2008, Lewis transported hazardous waste, generated by a local manufacturing plant, to a licensed disposal facility.



Assessment and removal of hazardous waste Lewis illegally stored inside storage unit at Bass at Wesleyan self storage..

On February 26, 2009, forty 55-gallon drums and sixteen 275-gallon totes of this hazardous waste material were found to be improperly stored at a self-storage facility in Macon, Georgia. The units had been rented by Lewis in July 2007. Lewis rented four additional units in August 2007. It was also determined that Lewis had improperly stored hazardous waste, including highly flammable solvents and highly toxic cyanide wastes, in Rex, Georgia, and at his home in Albany, Georgia. For more information, [see the complete case summary](#).

### Owner of Colorado Aircraft Painting Company Sentenced for Unlawfully Treating Hazardous Waste

Norman Teltow, owner of Gold Metal Paint Co. LLC (GMP), was sentenced in November 2013 to serve six months home confinement with electronic monitoring, pay a \$10,000

criminal fine, and serve two years of probation. Teltow pleaded guilty in March 2013 to illegally treating hazardous waste at the company's facility. Teltow operated GMP out of a hangar near the Front Range Airport in Watkins, Colorado. GMP was primarily in the business of painting small aircraft. During the course of its business, GMP created hazardous waste in the form of spent methylene chloride-based solvents mixed with paint waste. GMP was required to use a licensed waste management company to transport the hazardous waste to a licensed facility for disposal. However to avoid the costs associated with proper disposal, Teltow directed GMP employees to store the spent solvents in an under ground tank below the facility knowing that it was illegal to store the waste in that manner.

When the Colorado Department of Public Health and Environment (CDPHE) became aware of the situation, it conducted an inspection and ordered Teltow to hire a licensed waste management company to pump the waste out of the tank and dispose of it properly. CDPHE further ordered that the tank be cleaned, that the trench drain leading to the underground tank be sealed, and that GMP use a licensed waste management company to transport all hazardous waste in the future. In response to CDPHE's orders, Teltow hired a licensed waste management company to pump out the tank, and sealed off the trench drain to the underground tank. However, rather than hire a licensed waste management company to clean out the tank, Teltow ordered subordinate employees to clean out the tank without the benefit of any personal protective equipment, exposing them to hazardous waste containing methylene chloride. The employees suffered from headaches, dizziness, and nausea as a result. Teltow then devised a new plan for treating the hazardous waste by "evaporating" it into the atmosphere. Teltow ordered his employees to pour the hazardous waste onto the floor of the hangar at the end of the work day and then leave the hangar doors ajar to allow the waste to evaporate. When Teltow's "evaporation" method was unsuccessful at treating all of the waste that GMP accumulated, Teltow drilled open the trench drain ordered sealed by CDPHE so that the waste could again flow into the underground tank. For more information, [see the complete case summary](#).



Gold Metal Paint Co. stripper hangar showing methylene chloride stripper waste drain.

#### Former President of Port Arthur, Texas, Chemical Company Sentenced for Federal Crimes Related to Employee Deaths

Matthew Lawrence Bowman, the former president of a Port Arthur, Texas, Chemical Company, was sentenced in October 2013 for occupational safety crimes which resulted in the death of an employee. He pleaded guilty in May 2013 to violating the Occupational Safety and Health Act and making a false statement and was sentenced to serve 12 months in federal prison and ordered to pay fines in the amount of \$5,000. Bowman admitted to not properly protecting PACES employees from exposure to hydrogen sulfide, a poisonous gas resulting in the death of truck driver Joey Sutter on Dec. 18, 2008. In addition, Bowman admitted to directing employees to falsify transportation documents to conceal that the wastewater was coming from PACES after a disposal facility put a moratorium on all shipments from PACES after it received loads containing hydrogen sulfide.

Bowman was president and owner of PACES, located in Port Arthur and CES Environmental Services located in Houston. PACES was in operation from November 2008 to November 2010, and was in the business of producing and selling caustic materials to



paper mills. The production of caustic materials involved hydrogen sulfide, a poisonous gas. According to the National Institute for Occupational Safety and Health, hydrogen sulfide is an acute toxic substance that is the leading cause of sudden death in the workplace. Employers are required by OSHA to implement engineering and safety controls to prevent employees from exposure above harmful limits of hydrogen sulfide.



Port Arthur Chemical and Environmental Services facility.

Bowman was responsible for approving and directing PACES production operations, the disposal of hydrogen sulfide wastewater, and ensuring implementation of employee safety precautions. In some cases, Bowman personally handled the investigation of work-related employee injuries, directed the transportation of PACES wastewater, and determined what safety equipment could be purchased or maintained. In the cases at issue, hazardous materials were transported illegally with false documents and without the required placards. Most importantly, the workers were not properly protected from exposure to hazardous gases. The exposure resulted in the deaths of two employees, Joey Sutter and Charles Sittig, who were truck drivers, at the PACES facility on December 18, 2008 and April 14, 2009. Placarding is critical to ensure the safety of first responders in the event of an accident or other highway incident. Bowman and PACES were indicted by a federal grand jury on July 18, 2012. For more information, [see the complete case summary](#).

**Former Texas Logistics Company Manager Sentenced for Falsifying Shipping Documents**

Ryan Thomas, former logistics manager for CES Environmental Services in Houston, Texas, was sentenced in July 2014 to 12 months' probation, ordered to pay a \$500 fine, and serve 100 hours of community service for falsifying shipping documents related to the transportation of hazardous materials.

Thomas produced manifests that indicated that three tanker truckloads of wastewater originated from CES' Houston plant when in fact, they were produced and shipped from CES' Port Arthur (PACES) plant. The PACES location was placed on a moratorium after a November 3, 2008, accident in which a CES driver was overcome by vapors released during the offloading of wastewater. The disposal facility placed the moratorium on all loads of waste-water from the PACES location until the cause of the accident could be identified and new inbound load testing protocols were agreed to. For more information, [see the complete case summary](#).

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**Title 18 Cases**

**North Carolina Recycling Business and Owner Sentenced for Unlawful Handling of PCB-Contaminated Oil, Tax Violations, and False Statements**

Benjamin Franklin Pass, owner and operator of P&W Waste Oil Services, Inc., was sentenced in July 2014 to 42 months in prison and ordered to pay restitution of more than \$21 million for clean-up costs associated with the environmental contamination at his business and an additional \$539,000 to the Internal Revenue Service for federal income taxes he failed to pay between 2002 and 2011.



PCB warning sign posted at entry on P&W



P&W Waste Oil Services, Inc. was ordered to pay restitution of more than \$21 million for losses incurred by Colonial Oil and International Paper as a result of the mishandling of used oil contaminated with polychlorinated biphenyls (PCB) that led to widespread contamination and millions of dollars in clean-up costs. P&W was also ordered to serve a five-year term of probation and to take remedial action to address the environmental contamination at its facility and other leased property in eastern North Carolina.

Waste Services building.

P&W collected, processed and marketed used oil from automotive service stations, transformer repair companies and marinas. P&W was not authorized to handle or store used oil containing more than two parts per million (ppm) of PCBs, man-made organic chemicals that are known carcinogens. Law enforcement learned that in 2009 and again in 2010, Pass and P&W falsely certified that its employees had taken requisite training on the handling of hazardous wastes and that, between 2002 through 2011, Pass failed to pay his federal income taxes despite having the ability to pay. For more information, [see the complete case summary](#).

Alabama Pest Control Company and Its Owner Plead Guilty to Unlawful Application of Pesticides at Georgia Nursing Homes

Steven A. Murray and his company, Bio-Tech Management, Inc., pleaded guilty in March 2014 to charges of conspiracy, unlawful use of pesticides, false statements and mail fraud in connection with the misapplication of pesticides in Georgia nursing homes.

According to the plea agreement, from October 2005 to June 2009, Murray and Bio-Tech provided monthly pest control services to nursing homes in Georgia by spraying pesticides in and around their clients' facilities. Bio-Tech employees routinely applied the pesticide Termidor indoors, contrary to the manufacturer's label instructions. After the Georgia Department of Agriculture made inquiries regarding Bio-Tech's misuse of Termidor and other pesticides, Murray directed several of his Bio-Tech employees to alter company service reports with the intent to obstruct an investigation. For more information, [see the complete case summary](#).



Georgia Department of Agriculture inspector taking samples to be tested for the presence of Termidor inside the nursing home.

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# National Environmental Policy Act (NEPA) 2014 Annual Results

In fulfillment of our responsibilities under Section 309 of the Clean Air Act, EPA issued comment letters on over 350 draft and final Environmental Impact Statements (EISs). These included EISs concerning:

- renewable energy – 15
- oil and gas exploration or extraction - 9
- mining - 19
- transmission lines – 10

EPA met its performance goals in FY 2014 for the NEPA program: 76% of the significant impacts identified in EPA's comment letters on Draft EISs were avoided, minimized, or compensated for ("mitigated") by the lead Agencies in the Final EISs published in FY 2014.

## High Priority Infrastructure Projects

EPA worked with the Office of Management and Budget (OMB) and other Federal Agencies in support of the Presidential Memorandum on Modernizing Infrastructure Permitting. EPA engaged with lead Federal Agencies during NEPA reviews to support work on a number of high priority infrastructure projects identified through this Presidential Memorandum and the Executive Order on Improving Performance of Federal Permitting and Review of Infrastructure Projects.

EPA also worked with federal agencies as a member of the Rapid Response Team for Transportation to improve federal agency coordination and timely completion of permits, reviews, and requirements for high priority infrastructure projects.

## Air Quality Memorandum of Understanding

EPA continued its efforts to implement the interagency Memorandum of Understanding (MOU) with the Bureau of Land Management, the Forest Service, the National Park Service, and the Fish and Wildlife Service that established a mutually acceptable approach for addressing air quality analyses and mitigation for Federal oil and gas development actions. In February and March of 2014, EPA hosted three training sessions for participants across the country representing signatory agencies of the MOU. In addition, EPA worked with the signatories Agencies to develop a training for tribes that was presented in September 2014 and a training for the States that will be presented in FY 2015.

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